

SUMMARY OF HWMU CLOSURE ACTIVITIES
ROTH BROS. SMELTING CORP.
EAST SYRACUSE, NEW YORK

by

H&A of New York
Rochester, New York

for

Roth Bros. Smelting Corp.
East Syracuse, New York

File No. 70185-45
October 1992





Geotechnical Engineers &
Environmental Consultants

28 October 1992
File No. 70185-45

New York State Department of
Environmental Conservation
Bureau of Eastern Region Hazardous Wastes
Division of Hazardous Substances Regulation
50 Wolf Road
Albany, New York 12233-7252

Attention: John Middelkoop, Director

Subject: Summary of HWMU Closure Activities
Roth Bros. Smelting Corp.
East Syracuse, New York

Gentlemen:

This report describes closure activities recently completed on three hazardous waste storage areas at the Roth Bros. Smelting Corp. in East Syracuse, New York. Closure activities were conducted in accordance with the approved closure plan in Roth's Part 373 permit (USEPA I.D. No. NYD006977086) dated October 1986. An extension for submittal was approved following a 29 September telephone conversation with Mr. Thomas John (NYSDEC) and Mr. Robert Harvey, (NHDD-counsel to Roth Bros.). A second extension for submittal of the closure certification (included in this report) to 30 October 1992 was granted by Mr. Thomas John on 13 October 1992, per telephone communication with Elizabeth Henderson of H&A of New York.

H&A of New York personnel were present on site to observe activities associated with the storage area cleaning and to perform sampling of the walls and floors in each closure area before and after cleaning activities.

A description of the closure activities conducted at the three hazardous waste storage areas on Plants 1 and 2 is presented below. Information is presented and closure activities are described in the same order as described by the Approved Roth Bros. Part 373 Permit Closure Plan (Appendix A). In summary, remaining waste inventory was removed from the storage areas and shipped to an approved disposal facility; samples were taken before initiation of cleaning; storage area cleaning was performed as described in the closure plan; and confirmation samples were taken after cleaning to document the efficiency of cleaning. Sample results indicate closure in

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conformance with the closure plan has been completed for the Plant 1 storage area, the northern Plant 2 storage area, and one-half of the southern Plant 2 storage area. Residual lead concentrations above TCLP criteria in storage area floor samples prevent confirmation of closure at this time of the remaining one-half of the southern area. Recommendations for re-opening adequately closed areas for <90 day storage and resolution of the lead residues in the remaining one-half area are presented at the conclusion of this report.

STORAGE AREA LOCATIONS AND DESCRIPTION

Three hazardous waste storage areas (Hazardous Waste Management Units - HWMUs) were operated at the Roth Bros. site, as shown on Figure 1. The Plant 1 HWMU storage area consists of one enclosed room with a concrete floor and metal walls (Figure 2). Hazardous wastes stored in the Plant 1 storage area, prior to closure activities, were aluminum baghouse dusts designated as D006 and D008 wastes.

The Plant 2 designated HWMU storage areas are located on the west side of Plant 2, and consist of three covered rooms, as shown on Figure 2. For purposes of discussion, these rooms have been designated as copper dust storage areas A and B and the lead dust storage. Areas A and B are three sided, with an open side to the east, and constitute the northern storage area of the two Plant 2 HWMUs. The lead dust storage area is open on the east and south sides and constitutes the southern storage area of the two Plant 2 HWMUs. D006 and D008 wastes were stored in areas A and B prior to closure activities. Waste designated as K069 baghouse dust was stored in the Plant 2 lead storage unit prior to closure activities.

The Plant 2 HWMU areas shown in the Closure Plan (Appendix A) indicates the presence of a crusher baghouse on the southeast corner of the present northern storage area. The baghouse operated from 1977 to 1987. In 1987, it was destroyed by fire, which was reportedly contained within the baghouse. The former baghouse managed copper and aluminum dust containing cadmium and lead (D006, D008). The area was then used for storage of the lead baghouse dusts.

The three bays where the former baghouse was located were renovated about 1989. The asphalt was removed and replaced with about an 8± in. poured concrete floor.

Confirmation sampling performed during closure included analyses for the above wastes (Total lead and cadmium, and TCLP analyses). PCBs were not routinely handled by Roth Bros. However, recent testing of baghouse dusts has shown the presence of PCBs. Therefore, PCBs were included in the sampling and analyses plan to determine their presence following cleaning activities.

INVENTORY REDUCTION

Hazardous materials were routinely collected directly from baghouse operations and stored in 43-cu. ft. triple corrugated boxes (Gaylord boxes) lined with 4 ml. polyethylene bags. Once full, the bag is closed and tied off with wire and covered with another 4 ml. polyethylene bag and a secure cover. Final shipment of the wastes stored in the Plant 1 and 2 storage areas to the



Chemical Waste Management Emelle Facility in Alabama, occurred over the time period 21 September to 3 October 1992. Manifests documenting the shipments of remaining wastes from the storage areas are provided in Appendix B.

FACILITY DECONTAMINATION

Facility decontamination was conducted by Action Cleaners of Syracuse, New York, on 5, 6 and 15 October 1992. Pre-cleaning activities, consisting of removal of inventory and an initial dry sweep, was performed by Roth Bros. personnel prior to the decontamination activities by Action Cleaners. The dry dusts collected were contained in the Gaylord boxes for offsite disposal. H&A of New York personnel monitored closure decontamination activities performed by Action Cleaners. A copy of H&A's Daily Field Reports describing each day's closure activities is included in Appendix C. In summary, decontamination consisted of spraying each room with a multi-purpose biodegradable industrial detergent, steam cleaning the walls and floors of each storage unit, and scrubbing with brushes. The ceiling in Plant 1 was also cleaned by the above-described method. Floors were cleaned using a power sprayer and brooms. Water was vacuumed and collected in 55-gal. drums for off-site disposal. Solid materials were shoveled into drums for off-site disposal. Please note that the approved Part 373 permit closure plan required only dry sweeping and vacuuming of the storage areas for closure. Observations of the storage areas prior to decontamination indicated collected dust may be too caked on to be adequately removed by a totally dry process. Therefore, pressure washing and scrubbing were used in the cleaning process.

SAMPLING ACTIVITIES

Precleaning Sampling

H&A of New York personnel collected nine precleaning wipe samples on 5 October 1992 to use as a basis for evaluating the efficiency of the cleaning operations conducted. Wipe samples C1 - C9 were collected from selected locations on the walls and floors of the hazardous waste storage units (see Figure 2). Upstate Laboratories provided the jars, filter paper and hexane for wipe samples, which were collected using a 100 square centimeter area template to standardize sample collection. The nine precleaning samples were submitted to Upstate Laboratory in East Syracuse for analyses for PCBs, total lead and total cadmium. A summary of the results is presented below in the "Analytical Laboratory Results" section.

Confirmation Sampling

H&A of New York personnel collected six (6) confirmation wipe samples in Plant 1 and eighteen (18) confirmation wipe samples in Plant 2, following completion of the cleaning activities described above. Wipe samples were collected from the walls and the floors and submitted to Upstate for PCBs, total lead and total cadmium. The locations of the nine precleaning wipe samples were resampled to provide confirmation of the efficiency of the cleaning operations. In addition, thirteen more sample areas from the walls and floors were also collected to evaluate the consistency of cleaning activities.



Composite concrete core samples, consisting of two or three cores from an area per sample, were also collected from the floor of the storage units and submitted for TCLP lead and TCLP cadmium. A concrete coring machine was used to collect floor slab cores to depths of approximately 1.0 to 1.5 in. from the surface of the slab. Core depths were limited so that the composite represented mostly surface material. Two (2) composite concrete core samples were collected on Plant 1 and eight (8) composite core samples were collected on Plant 2 on 6 October. Confirmation TCLP lead results in two bays in the lead storage area were above regulatory criterion therefore, additional cleaning and core sampling were performed. Five additional core samples were collected and submitted for TCLP lead analyses on 15 October.

Sampling locations for Plants 1 and 2 HWMUs are shown on Figure 2. A summary of the analytical results is presented below.

ANALYTICAL SAMPLING RESULTS

Laboratory analytical results for the precleaning and confirmation wipe samples are summarized on Table I and discussed below. Wipe samples were analyzed for PCBs, total lead and total cadmium based on the materials which were stored in the two areas. Results of the composite core sample analyses (for TCLP lead and TCLP cadmium) are summarized on Table II and discussed below. Laboratory analytical data is provided in Appendix D.

Target Cleanup Criteria

Cleanup criteria set for the HWMU closure at this site are as follows:

- o The wall and floor surfaces are to be visibly free of dusts.
- o For core samples collected from the floor, the sample must fall below TCLP regulatory levels of 1.0 mg/l for cadmium and 5.0 mg/l for lead.
- o For PCB wipe samples from the floors and walls, the target cleanup standard is 10 ug/100 cm², as per the 40 CFR Part 761.125 Spill Cleanup Policy for secure industrial surfaces and contact surfaces of metal parts/equipment.

Precleaning and Confirmation Wipe Sampling - Plant 1

PCBs - PCBs were not detected above laboratory detection limits in either the precleaning or confirmation samples. A trip-wipe sample accompanied the cooler containing the confirmation wipes from Plant 1. The trip-wipe was provided by the laboratory, accompanied the sampling jars to the site and back to the laboratory. PCBs were detected in the trip-wipe at 0.7 ug/wipe. No PCBs were detected in the confirmation results, indicating possible contamination of the trip-wipe prior to shipment to the site or during the laboratory analyses.



- Cadmium - Cadmium was detected in a floor precleaning sample C-2 at 0.0036 mg/wipe. However, cadmium was not detected in the confirmation sample C-106 at the same location. Cadmium was not detected in any of the other confirmation wipe samples in the Plant 1 closure area.
- Lead - Lead was detected in one floor precleaning sample (C-2) at 0.11 mg/wipe. The confirmation sample at this same location had a lead detection at 0.02 mg/wipe, just above the detection level of 0.01 mg/wipe. Confirmation sampling at other wipe locations for lead ranged from 0.01 to 0.02 mg/wipe.

Precleaning and Confirmation Wipe Sampling - Plant 2, Copper Storage

- PCBs - Precleaning concentrations of PCBs in Areas A and B (copper storage) ranged from nondetect to 2.4 ug/wipe in the seven wipe samples collected. Five confirmation wipe samples indicated no PCBs were detected; four confirmation wipe samples detected PCBs ranging from 0.5 to 2.2 ug/wipe, well below the target cleanup standard of 10 ug/wipe.
- Cadmium - Precleaning wipe samples for cadmium had concentrations ranging from nondetect to 0.014 mg/wipe. Confirmation wipe analyses results indicate cadmium at concentrations ranging from nondetect to 0.009 mg/wipe.
- Total Lead - Precleaning results for lead in Areas A and B ranged from 0.07 to 2.7 mg/wipe. Nine confirmation wipe samples analyses ranged from 0.04 to 1.1 mg/wipe.

Core Sampling - Plant 1

Two composite core samples (C-101, C-102) were collected from the Plant 1 HWMU storage area. Each composite consisted of three cores, designated with an A, B or C after each sample number (i.e. C-101A, C-101B and C-101C make up sample C-101; see Figure 1). Analytical results indicate the TCLP cadmium was 0.022 and 0.2 mg/l, well below the 1.0 mg/l regulatory threshold. TCLP lead was non-detect and 0.3 mg/l in the two core samples, again below the 5.0 mg/l regulatory level.

Core Sampling - Plant 2 Copper Storage

Three composite core samples (C-108, C-112, C-113) were collected from the copper storage HWMU (one from area A and two from area B) and analyzed for TCLP Cadmium and lead. Each composite consisted of three cores and are designated with an A, B or C after sample number (i.e. C-108A, C-108B and C-108C make up sample C-108). Cadmium results ranged from 0.008 to 0.090 mg/l, below the regulatory limit of 1.0 mg/l. Lead was detected at concentrations ranging from 0.7 to 3.1 mg/l, below the 5.0 mg/l regulatory limit.



Core Sampling - Plant 2 Lead Storage

Five composite core samples (C-117 through C-121) were collected on 6 October from the lead storage area. Each composite was made up from two cores (i.e. C-117A and C-117B) from each storage bay. Results indicate cadmium (TCLP) concentrations ranged from non-detect in three samples to 0.099 mg/l, below the regulatory limit.

Four of the five TCLP lead samples were detected at concentrations ranging from 0.3 to 4.4 mg/l, below the 5.0 mg/l standard. One sample (C-120) was detected at 13.0 mg/l for TCLP lead, in exceedance of the regulatory limit. C-120 was collected from the second bay from the west side of the storage area (see Figure 2).

Given the high results in C-120 and a result of 4.4 mg/l close to the 5.0 mg/l standard in C-121, the two western most bays were re-cleaned by Action Cleaners on 15 October 1992 (see Figure 2). Five additional composite core samples (C-127 through C-131) were collected from the upper 1 in. of asphalt and the samples were again analyzed for TCLP lead. Analytical results indicate the presence of lead at concentrations ranging from 3.6 mg/l to 42 mg/l. Three samples (C-127, C-128 and C-130) of the five exceeded the regulatory criteria for TCLP lead.

DISCUSSION

Closure activities for the three HWMU storage areas were performed on 5, 6 and 15 October 1992. Observations of the three storage areas indicate they were free of visible dust following the cleaning activities. Photographic documentation of each area before and after the cleaning is provided in Appendix E.

Laboratory analytical results indicate the target cleanup goals were met for the Plant 1 HWMU storage area, the Plant 2 copper dust HWMU storage area (consisting of 2 three-sided bays) and the eastern portion of the lead dust HWMU storage area. H&A of New York considers these areas to have met the criteria for closure. No further action appears necessary. We recommend these areas be re-opened for short term (less than 90 days) storage of the baghouse dusts.

Asphalt cores from the western two bays of the lead dust storage area had concentrations of TCLP lead above the regulatory limit of 5.0 ppm. Based upon recent discussions with Roth Bros. personnel, the two western bays were paved with asphalt in 1962 and an additional 1± in. top coat of asphalt was put on in 1984. There was no visible difference between the two layers, as observed in the core sample holes.

We recommend additional detailed profile sampling be performed to establish the locations and depths of the lead concentrations within the asphalt. Upon the receipt of the results, measures will be developed to finalize the closure of these two bays. H&A will summarize these remaining activities and provide certification of closure upon completion.

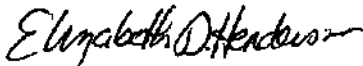


SCHEDULE AND CLOSING

H&A will prepare and implement a detailed sampling plan to address the remaining area to be closed. We anticipate performing the sampling within the next two weeks. Following receipt of results we will evaluate appropriate additional closure measures that may be required for the remaining one-half of the Plant 2 lead storage area.

Please do not hesitate to contact us if you have any questions.

Sincerely yours,
H&A OF NEW YORK



Elizabeth D. Henderson
Senior Env. Geologist



Vincent B. Dick
Senior Env. Geologist

EDH:VBD:gmc
rjmidd01.wp

Attachments:

- Table I - Laboratory Analytical Results - Wipe Samples
- Table II - Laboratory Analytical Results - Core Samples
- Figure 1 - Hazardous Waste Management Unit Location Plan
- Figure 2 - Sample Location Plan - Plants 1 and 2
- Appendix A - Closure Plan
- Appendix B - Hazardous Waste Manifests
- Appendix C - Daily Field Reports
- Appendix D - Laboratory Analytical Results
- Appendix E - Photographic Documentation



CERTIFICATION

H&A of New York observed performance of closure activities at the Roth Bros. Plant 1 and Plant 2 HWMU-storage areas during the period 5-7 and 15 October 1992. Activities as described in the approved Part 373 Permit Closure Plan (dated October 1986) for these units were performed and supplemented as described in this report. H&A of New York states that the closure for the hazardous waste storage unit on Plant 1, the copper storage area on Plant 2 and one half of the lead storage area on Plant 2 have been performed in accordance with the approved closure plan.

I state that I have personally examined and am familiar with the information in this Report. Based upon our knowledge and inquiry of those individuals responsible for obtaining the information presented, the foregoing information is true, accurate and complete based upon the scope of work performed.



Lawrence P. Smith, P.E.
Partner



Tables

TABLE I
LABORATORY ANALYTICAL RESULTS- WIPE SAMPLES
ROTH BROS. HWMU CLOSURE

SAMPLE NO.	LOCATION	PCBs (ug/wipe)		TOTAL CADMIUM (mg/wipe)		TOTAL LEAD (mg/wipe)	
		PRECLEAN	CONFIRM.	PRECLEAN	CONFIRM.	PRECLEAN	CONFIRM.
<u>PLANT 1</u>							
C-1/C-101	WALL	<0.1	<0.1	<.0005	<.0005	<.01	0.02
C-103	WALL	NA	<0.1	NA	<.0005	NA	0.01
C-104	WALL	NA	<0.1	NA	<.0005	NA	0.02
C-105	WALL	NA	<0.1	NA	<.0005	NA	0.02
C-2/C-106	FLOOR	<0.1	<0.1	0.0036	<.0005	0.11	0.02
C-107	WALL	NA	<0.1	NA	<.0005	NA	0.02
TRIP WIPE	--	NA	0.7	NA	<.0005	NA	0.01
<u>PLANT 2</u> <u>COPPER HWMU</u>							
	<u>AREA A</u>						
C-108	FLOOR	NA	1.0	NA	0.0031	NA	0.26
C-3/C-109	WALL	2.4	0.5	0.014	0.0011	2.7	0.36
C-110	WALL	NA	2.2	NA	0.009	NA	0.08
C-111	WALL	NA	<0.1	NA	0.0011	NA	0.04
<u>PLANT 2</u> <u>COPPER HWMU</u>							
	<u>AREA B</u>						
C-112	FLOOR	NA	0.5	NA	0.0052	NA	0.64
C-4/C-113	FLOOR	1.8	<0.1	0.0097	0.0059	1.4	1.1
C-5/C-114	WALL	<0.1	<0.1	<.0005	0.0011	0.07	0.06
C-115	WALL	NA	<0.1	NA	<0.0005	NA	0.1
C-116	WALL	NA	<0.1	NA	0.0018	NA	0.09
<u>PLANT 2</u> <u>LEAD HWMU</u>							
C-6/C-118	FLOOR	0.8	0.11	0.0080	0.011	1.3	1.4
C-7/C-120	FLOOR	1.1	<0.1	0.053	0.0083	6.1	1.3
C-8/C-122	WALL	<0.1	<0.1	0.0085	0.0024	2.4	0.24
C-123	WALL	NA	<0.1	NA	0.0019	NA	0.16
C-124	WALL	NA	<0.1	NA	0.0015	NA	0.06
C-9/C-125	WALL	<0.1	<0.1	0.0064	0.0028	1.3	0.31
C-126	WALL	NA	<0.1	NA	0.014	NA	1.3
TRIP WIPE	--	NA	<0.1	NA	0.0009	NA	<0.01

Notes:

1. NA = No preclean sample taken for analysis.
2. Samples were collected on 5 and 6 October 1992 by H&A of New York personnel. Analyses were performed by Upstate Laboratories. Analytical reports are provided in Appendix C.
3. Trip wipe samples were analyzed for each day of sampling.
4. Precleaning samples were collected from selected locations in each HWMU closure area prior to initiation of cleaning activities.
5. Confirmation wipe samples were collected in the same location as the precleaning samples as a measure of the efficiency of the cleaning, and at additional locations to evaluate consistency of closure results.

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H & A OF NEW YORK
ROCHESTER, NEW YORK

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TABLE II
LABORATORY ANALYTICAL RESULTS- CORE SAMPLES
ROTH BROS. HWMU CLOSURE

SAMPLE NO.	LOCATION	TCLP CADMIUM	TCLP LEAD
<u>PLANT 1</u>			
C-101		0.022	<.01
C-102		0.02	0.3
<u>PLANT 2</u>	COPPER STORAGE		
C-108	AREA A	0.090	3.1
C-112	COPPER STORAGE	0.008	0.7
C-113	AREA B	0.057	2.4
C-117	LEAD STORAGE	<.005	0.5
C-118	AREA	<.005	0.3
C-119		<.005	0.3
C-120		0.099	13.0
C-121		0.086	4.4
C-127		NA	18.0
C-128		NA	23.0
C-129		NA	3.6
C-130		NA	42.0
C-131		NA	4.0

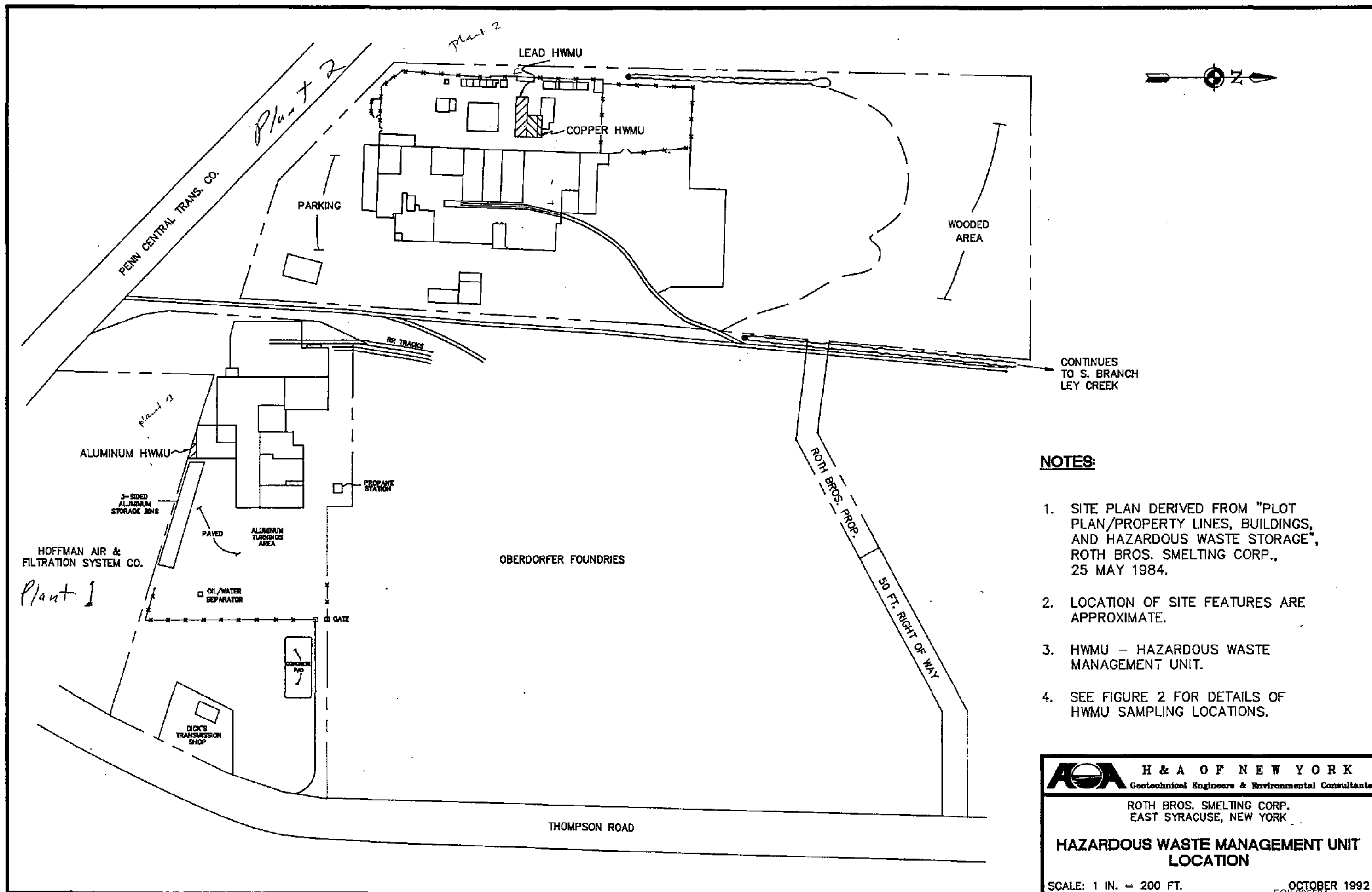
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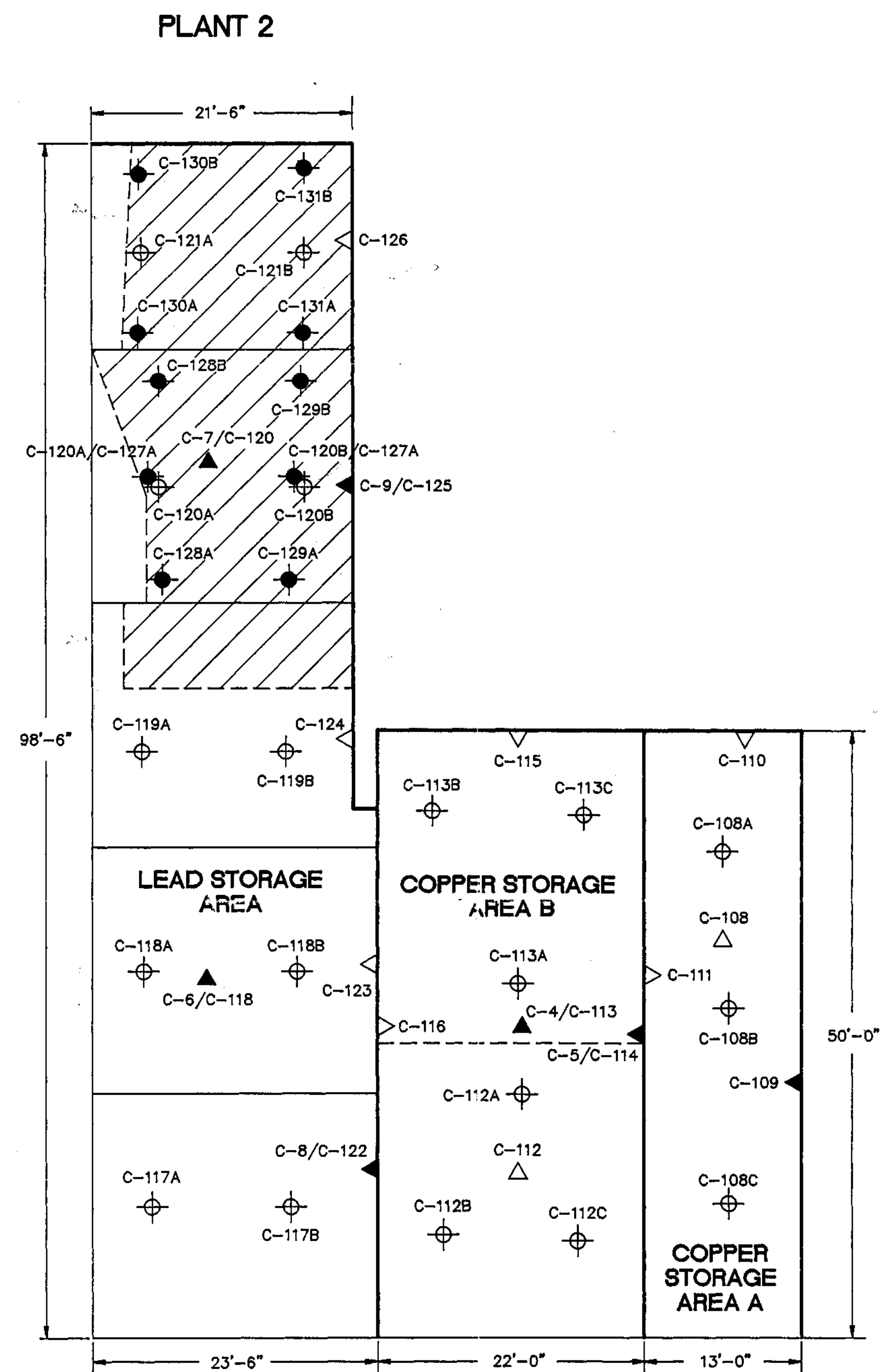
1. TCLP - Toxicity Characteristic Leaching Procedure
2. Core samples are composite samples of two to three core locations within an area. See report text for core sampling and composite description.
3. Core samples were obtained using a concrete coring machine, on 6 October 1992 and 15 October 1992.
4. "NA" Not Available, samples were not analyzed for this parameter.
5. TCLP Regulatory levels are 5.0 mg/l for lead and 1.0 mg/l for cadmium.
6. Results expressed in mg/l.

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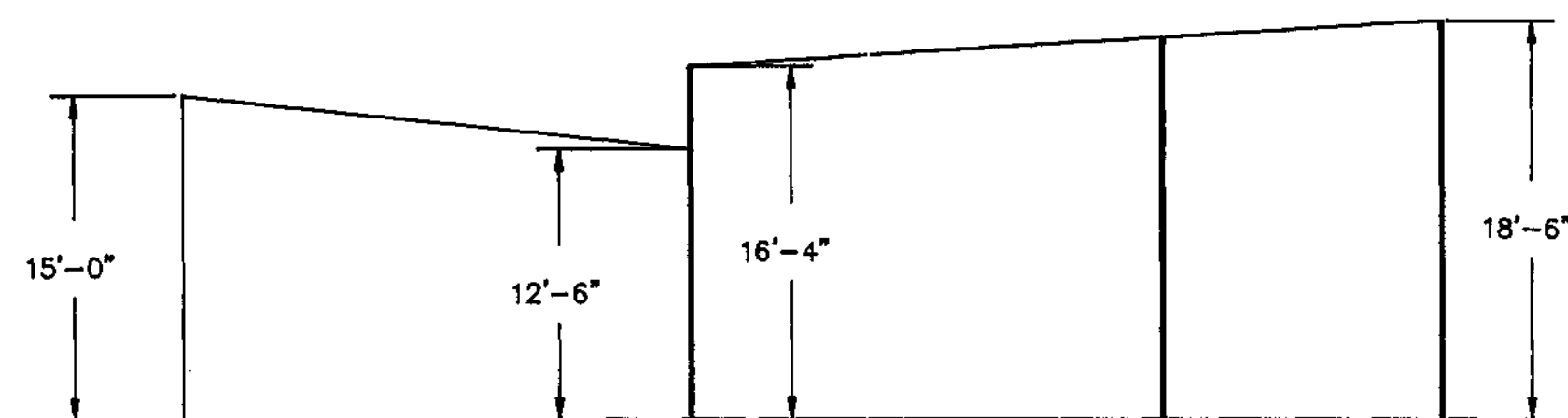
Figures

Figures

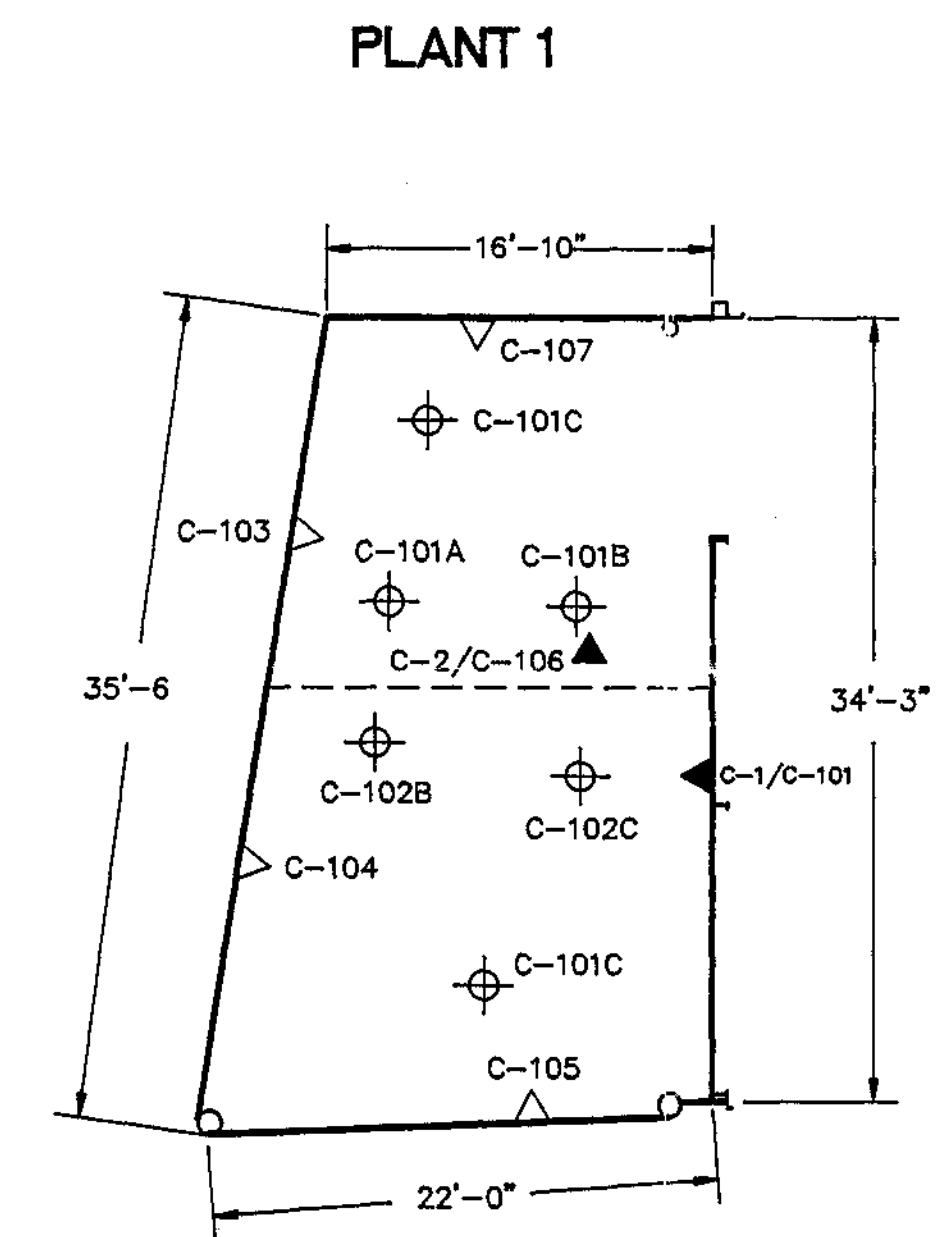




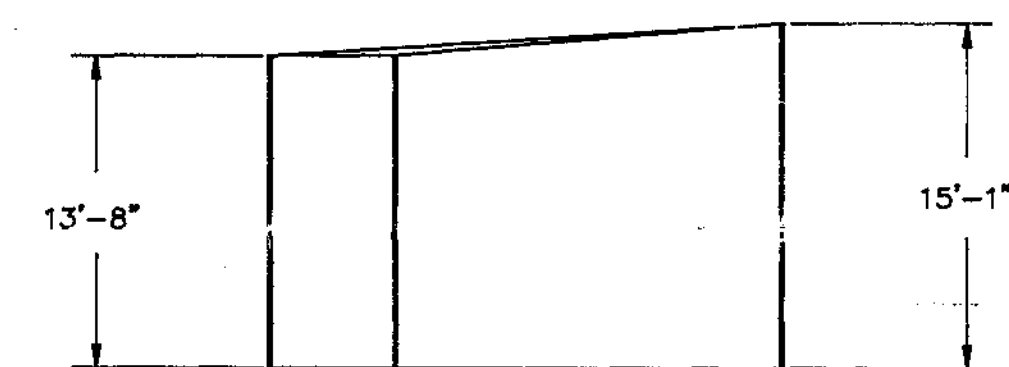
- FLOOR PLAN -



- WALL HEIGHTS -



- FLOOR PLAN -



- WALL HEIGHTS -



LEGEND:

- C-1/C-101
▲ PRELIMINARY AND CONFIRMATION WPE SAMPLE LOCATION AND NUMBER.
- C-102A
⊕ CONFIRMATION CORE SAMPLE LOCATION AND NUMBER, COLLECTED ON 6 OCTOBER 1992. SEE NOTE 2.
- C-103
△ CONFIRMATION WPE SAMPLE LOCATION AND NUMBER.
- C-128
⊕ CONFIRMATION CORE SAMPLE LOCATION AND NUMBER, COLLECTED ON 15 OCTOBER 1992. SEE NOTE 2.

NOTES:

1. SAMPLE LOCATIONS WERE TAPED IN THE FIELD BY H&A OF NEW YORK PERSONNEL AND ARE APPROXIMATE.
2. CONCRETE CORE SAMPLES SUBMITTED TO LABORATORY AS A COMPOSITE OF A, B, AND C IN PLANT 1 AND IN THE COPPER DUST STORAGE AREAS A AND B IN PLANT 2. COMPOSITES IN THE LEAD DUST STORAGE AREA WERE COMPOSED OF TWO CORES PER BAY (A AND B). FOR EXAMPLE, C-128A AND C-128B COMPRISE SAMPLE C-128.
3. SEE TEXT FOR ADDITIONAL INFORMATION.



H & A OF NEW YORK
Geotechnical Engineers & Environmental Consultants

ROTH BROS. SMELTING CORP.
EAST SYRACUSE, NEW YORK

**SAMPLE LOCATION PLAN
PLANT 1 AND PLANT 2**

SCALE: 1 IN. = 100 IN.

OCTOBER 1992

FIGURE 2

Appendix A

Appendix A

APPENDIX A

Closure Plan



Roth Brothers Smelting Corporation
6223 Thompson
East Syracuse, NY

EPA I.D. No. NYD006977986

6NYCRR PART 373 PERMIT
ATTACHMENT V
CLOSURE PLAN

SECTION 4CLOSURE4.01 Closure Plan and Cost Estimate

Closure of Roth Bros.' hazardous waste storage facility will consist of removal of all hazardous wastes and waste residues, and decontamination of equipment. A detailed Closure Plan including the required closure cost estimate is provided in Appendix H. In the event that Roth Bros. undertake partial closure (e.g. close one or two of the three hazardous waste storage areas), it would be conducted in accordance with the procedures described in the full Closure Plan. The cost would be an appropriate fraction of the total cost.

4.02 Financial Assurance Mechanism

Roth Bros. Smelting Corp. has established financial assurance for closure of the facility in accordance with option (3) of 6 NYCRR 373-2.8(d); they have obtained an irrevocable standby letter of credit. This letter is included in Appendix I.

4.03 Liability Coverage

Documentation of Roth Bros.' liability coverage in accordance with 6 NYCRR 373-2.8(h) is included in Appendix J.

PLAN AND COST ESTIMATE
FOR CLOSURE OF
HAZARDOUS WASTE STORAGE AREAS

AT

ROTH BROS. SMELTING CORP.
Thompson Road
East Syracuse, New York 13057

USEPA ID NO. NYD006977086

(Revised as of September, 1986)

I. INTRODUCTION

Pursuant to regulations promulgated under authority of the Environmental Conservation Law of New York State in 6 NYCRR 373-2.7, Roth Bros. Smelting Corp. (Roth Bros.), as a Hazardous Waste Storage Facility, is required to maintain a Closure Plan and cost estimate for closure of the facility. The following sections describe the Closure Plan for this facility (USEPA ID No. NYD006977086). Partial closure of Roth Bros. facility, if conducted, would also follow the procedures in this plan.

II. FACILITY DESCRIPTION

Roth Bros. Smelting Corp. is engaged in the business of reclaiming non-ferrous metals and alloys through secondary smelting and refining of purchased scrap, drosses, and by-products. Their primary materials and products are lead-tin solder, copper, zinc, aluminum, and Zamac (zinc-aluminum alloy).

Roth Bros. facility occupies about 35 acres in Onondaga County, New York, (Figure 1). Within the facility there are three designated hazardous waste storage areas. Areas where hazardous waste is generated, handled or stored are shown on Figures 2 and 3.

Currently, the following hazardous wastes are stored at Roth Bros.;

1. Aluminum Dust - an air pollution dust from aluminum furnaces -USEPA Codes D006, D008.
2. Copper Dust - an air pollution dust from the copper rotary furnace - USEPA Codes D006, D008.
3. Lead Dust - an air pollution dust from secondary lead smelting - USEPA Codes K069.
4. Crusher Dust - an air pollution dust from aluminum crushing operation - USEPA Codes D006, D008.
5. Electroplating Sludge - a sludge generated from the treatment of electroplating wastewater - USEPA Code F006.
6. Lead Slag - slag generated from recycling of the electroplating sludge - USEPA Code F006.

Except electroplating sludge, which is stored in 55 gallon steel drums, all hazardous wastes are stored in 43 cu. ft. triple corrugated boxes (Gaylord boxes) lined with 4 mil polyethylene bags. When the bags are filled, they are closed and tied off with wire, and another 4 mil poly bag is placed over the top of the box as a secure cover. The boxes are strapped to wooden pallets and moved to the designated storage area with a forklift. This procedure minimizes or eliminates threats to human health and the environment.

All of the storage areas are asphalt paved and protected from the elements by side walls and a metal deck roof. Also, the outdoor storage areas are sloped from back to front to prevent run-on. Sufficient aisle space is available for inspection by personnel.

A daily inventory of all hazardous wastes that are generated on the site is recorded and maintained on a master inventory kept by the Company Secretary. A 3 part numbering system is used on each box to document shipments to an approved Hazardous Waste Disposal Facility. Currently, lead dust (K069) is being shipped to England for reclamation. Electroplating sludge is being reclaimed on-site in the lead furnace. All other hazardous wastes are being shipped to Fondessy Enterprises, Inc. in Oregon, Ohio (EPA No. OHDO45243706).

The maximum inventory of hazardous wastes which can be stored on site is 290 boxes.

III. REMOVAL OF INVENTORY AND FACILITY DECONTAMINATION

At this time, closure of the Facility is not anticipated, but an estimated closure date of June 30, 2036 has been chosen. All hazardous materials stored in Gaylord boxes at the time of closure (maximum 290 boxes) will be shipped to an authorized hazardous waste management facility.

A schedule for completion of closure is provided as Table 1. Since all of the storage areas are paved, the first stage of decontamination will be to clean the area with a power sweeper. The storage areas will then be covered with a sweeping/cleaning compound and again cleared with the power sweeper.

Residues of hazardous materials on all equipment will be eliminated by brushing down the equipment and vacuuming the dusts. This will be done using a high powered vacuum designed for small particle suction and retention. All of the above material (an estimated 15 Gaylord boxes) that is collected will be shipped to an authorized hazardous waste management facility. Since all areas of the facility in proximity to the storage areas are paved (Figure 1), there will not be any contaminated soil to dispose of. Depending on the condition of the facility at closure, wipe or smear tests may be necessary to determine the efficiency of the cleaning activities.

IV. EQUIPMENT REQUIRED

All equipment required for closure is owned by Roth Bros. and will be operated by Roth Bros.' employees. Table 2 lists the auxiliary equipment to be used. Any equipment used in the closure of the facility will be decontaminated by brushing and vacuuming. Wastes accumulated during this process will also be sent to an authorized hazardous waste management facility.

V. CLOSURE CERTIFICATION

A licensed professional engineer will monitor and inspect the waste storage areas and, following the completion of closure activities, certify that closure is complete. Certification will be made to the Commissioner by Roth Bros. and the Registered Professional Engineer that the facility has been closed in accordance with the specifications in this Closure Plan.

VI. COST ESTIMATE

A closure cost estimate, as required by 6 NYCRR 373-2.8, is shown in Table 3.

TABLE 1
MILESTONE CHART

December 30, 2035

- Notify NYSDEC of Planned Closure Date.

March 30, 2036

- Stop processing materials that generate hazardous wastes.
- Begin shipping stored hazardous wastes to an authorized hazardous waste management facility.
- Proceed until "0" inventory is accomplished.

May 15, 2036

- "0" Inventory accomplished.
- Cleanup storage areas and decontaminate equipment. Ship residual wastes to an authorized hazardous waste management facility. All work must be supervised by Professional Engineer.

June 30, 2036

- Submit certification of Closure to the Commissioner.

TABLE 2
INVENTORY OF AUXILIARY EQUIPMENT

15	Gaylord Boxes with plastic liners and covers
100	50 lb. bags of sweeping compound
1	High Powered Vacuum Cleaner
2	Brooms
2	Shovels
1	5,000 lb. capacity forklift, 1974 Clark Serial # 89228133
1	5,000 lb. capacity forklift, 1982 Hyster 550 E Serial # D2D10629C
1	Waldon Payloader 1978 Serial # 012492
1	Allis Chalmers Payloader - Model 640, 1983 Serial # 1651
1	Advance Sweeper Serial # 614643 - closed hopper 1978
	Appropriate protective equipment for personnel

* Note: All equipment is owned by Roth Bros. Smelting Corp.

TABLE 3

FINAL COST ESTIMATE

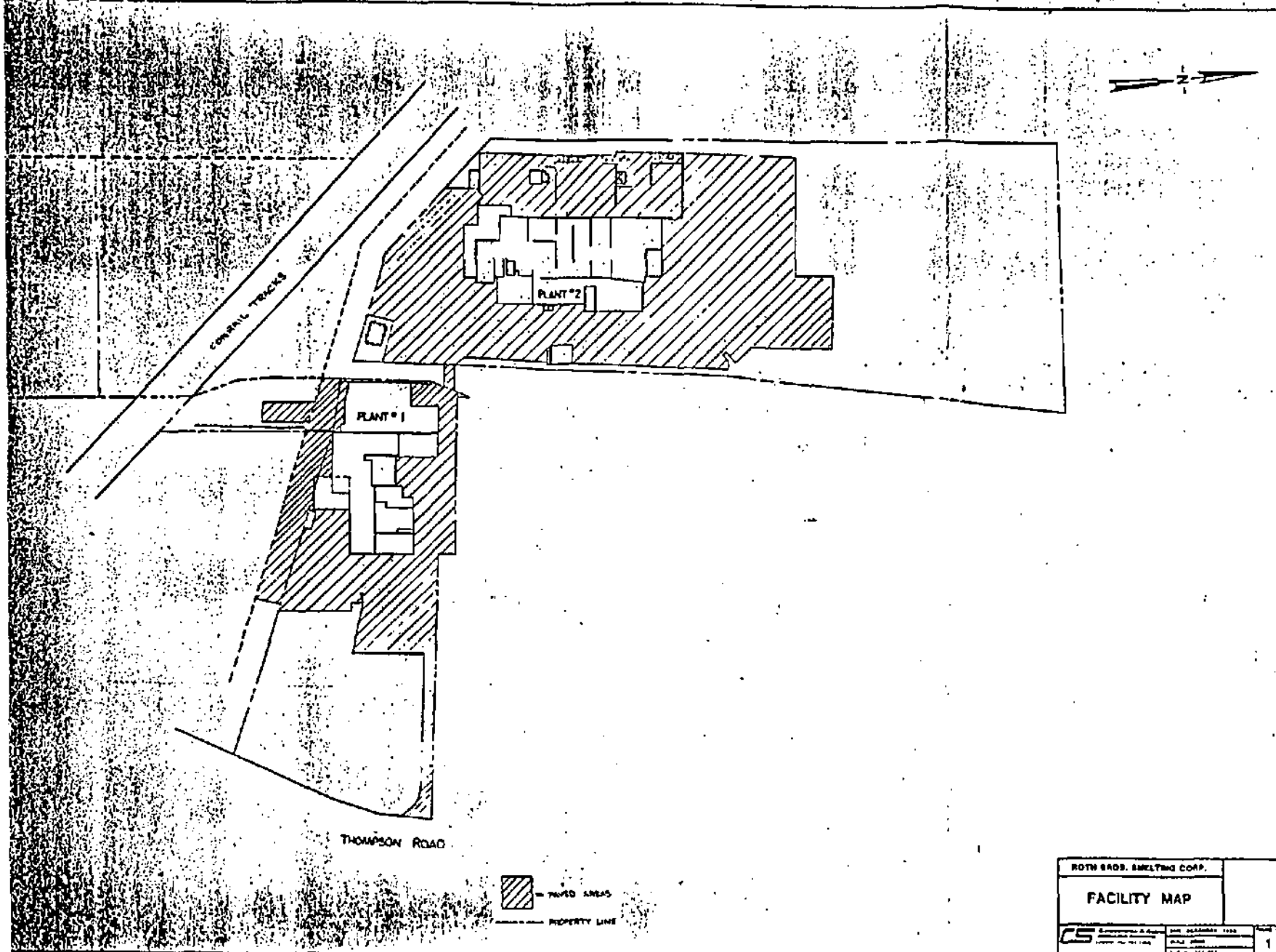
As Revised March 1, 1988

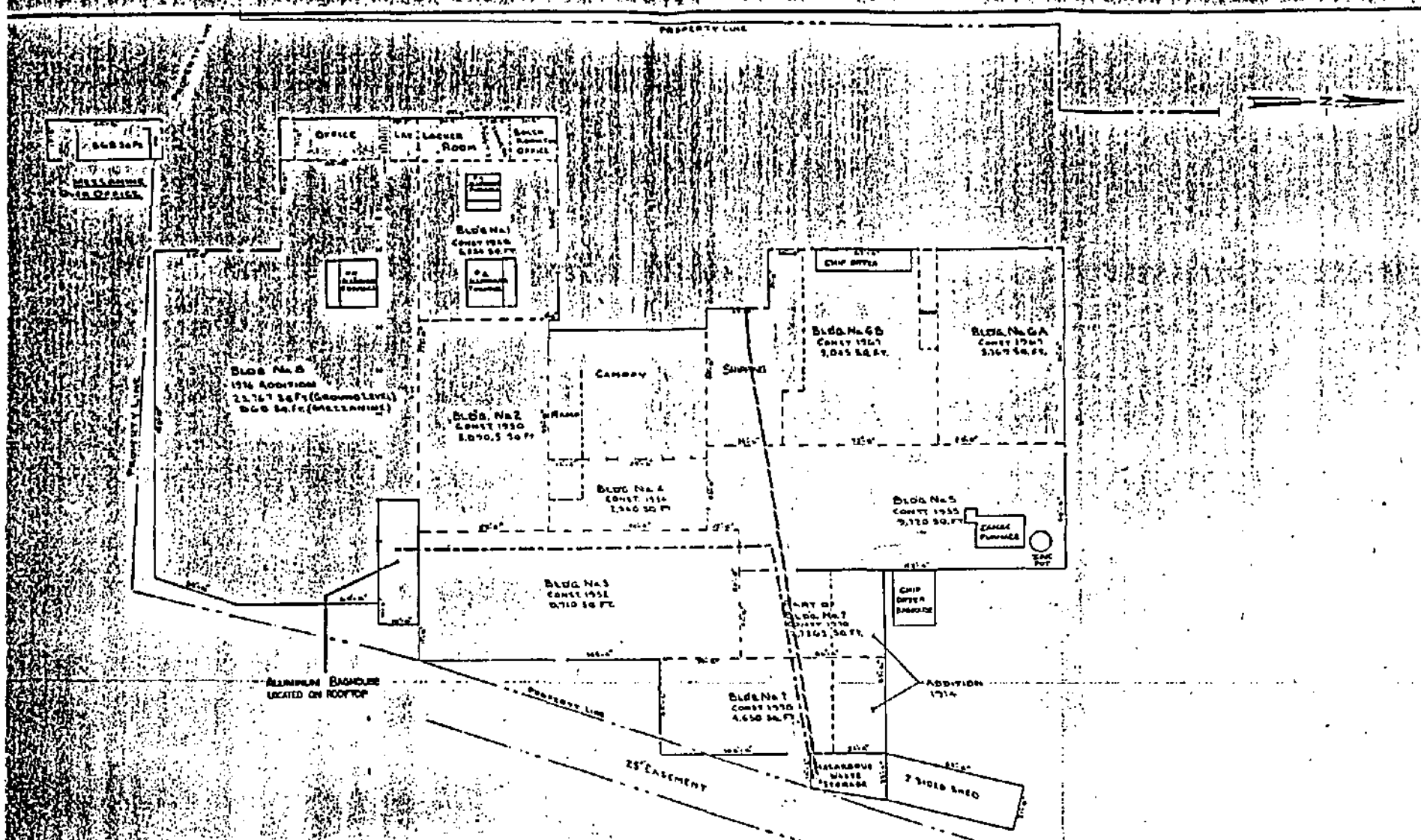
1. Ship stored boxes of waste to an authorized hazardous waste facility
Estimate 290 boxes @ \$185/Box \$53,650
2. Subcontract power sweeping of three (3) hazardous waste storage areas to outside contractor
Estimate 8 Hrs. @ \$100/Hr. \$ 800
3. Cover three areas with sweeping compound
Estimate 5,000 lbs. @ \$.0765/lb. \$ 383
4. Hand-sweep compound/brush & vacuum equipment
Estimate 16 Man Hrs. @ \$11/Hr. \$ 176
5. Gaylord Boxes with plastic liners and covers for disposal of sweeping compound
Estimate 15 Boxes @ \$8/ea. \$ 120
6. Hand-shovel residual wastes into Gaylord Boxes
Estimate 16 Man Hrs. @ \$11/Hr. \$ 176
7. Clean power sweeper, brooms, and shovels; load residual into Gaylord Boxes
Estimate 8 Man Hrs. @ \$11/Hr. \$ 88
8. Ship waste from decontamination procedures to authorized hazardous waste facility
Estimate 15 Boxes @ \$200/Box \$ 3,000
9. Sampling and analysis of wipe and smear tests
Estimate as performed by Environmental Lab \$ 120
10. Certification by licensed P.E.
Estimate as performed by Environmental Lab \$ 385
11. Administrative Costs -- Estimate 15% which includes direct supervision of clean-up by Roth Bros.' representative \$ 8,835
12. Allowance for Contingency
Estimate 15% \$ 8,835

\$76,568

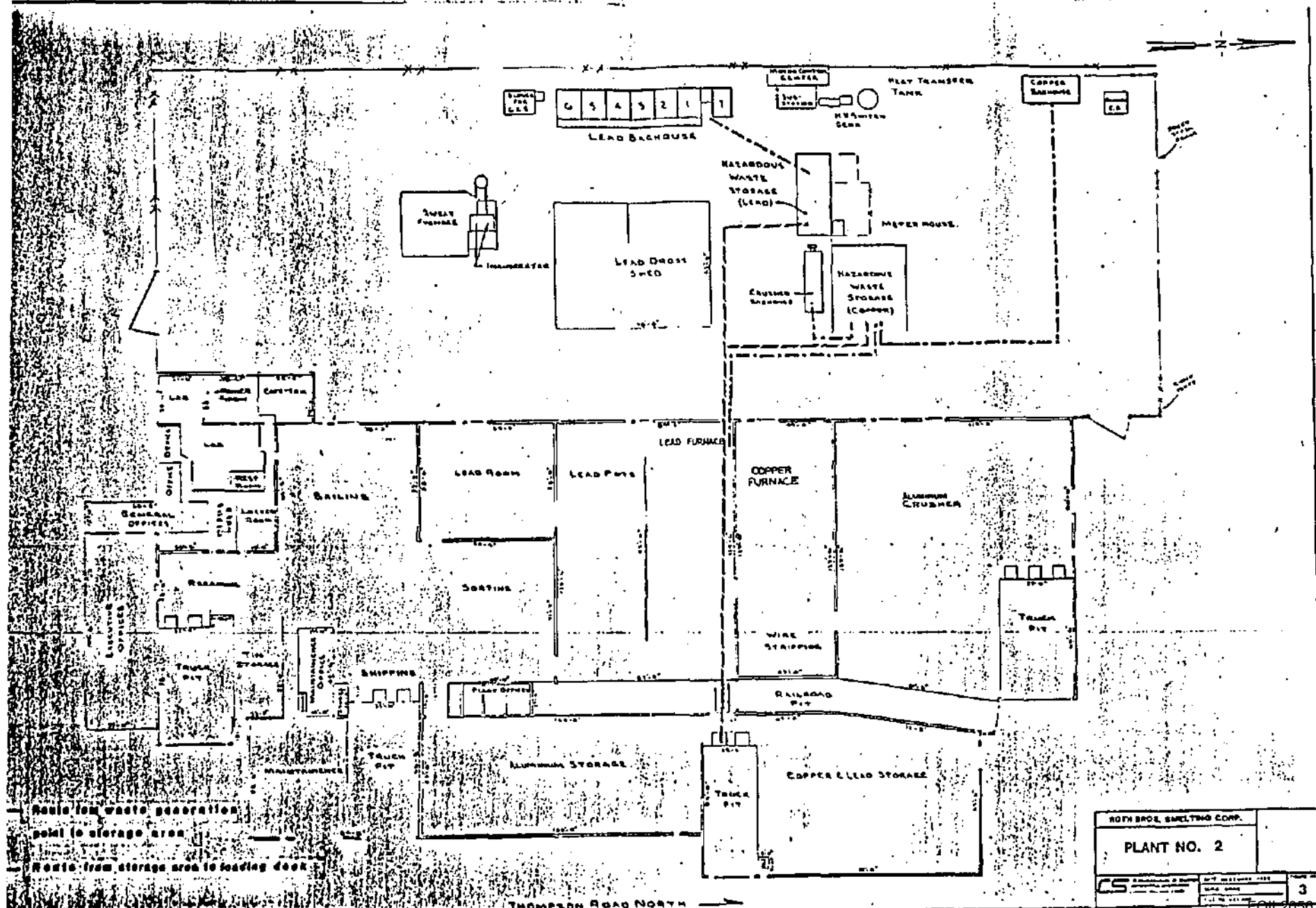
TABLE 3
FINAL COST ESTIMATE

1.	Ship stored boxes of waste to an authorized hazardous waste facility	estimate	290 boxes \$175/box	\$50,750
2.	Power sweep 3 storage areas (all tarvia covered)	estimate	1 man/2 days	120
3.	Cover 3 areas with sweeping compound	estimate	100 50-lb. bags \$7.60/ea.	760
4.	Hand sweep compound/brush and vacuum equipment	estimate	1 man/2 days	120
5.	Gaylord boxes with plastic liners and covers	estimate	15 boxes \$7.00/ea	105
6.	Hand shovel residual wastes into Gaylord boxes	estimate	2 men/1 day	120
7.	Clean power sweeper, brooms and shovels, load residual into Gaylord boxes	estimate	1 man/1 day	60
8.	Ship waste from decontamination procedures to hazardous waste facility	estimate	15 boxes \$175/box	2,625
9.	Sampling and analysis of wipe of smear tests			120
10.	Certification by Licensed P.E.			350
11.	Administrative Costs (15% - Includes Supervision by General Manager)			8,270
12.	Contingency (15%)			<u>8,270</u>
TOTAL				\$71,670





NORTH BRD. SMELTING CORP.	
PLANT NO. 1	
FOIL 205600	



ROTH BROS. SMELTING CORP.	
PLANT NO. 2	
CS	3



Merchants
Bank

148

The Merchants National
Bank & Trust Company
of Syracuse
216-220 South Warren Street
PO Box 4950
Syracuse, NY 13221
315 472 5561

April 1, 1986

Commissioner
New York State Department of Environmental Conservation
50 Wolf Road
Albany, New York 12233

Re: Letter of Credit No. 860401

Dear Sir or Madam:

We hereby establish and open our Irrevocable Standby Letter of Credit No. 860401 in your favor, at the request and for the account of Roth Brothers Smelting Corp., 6223 Thompson Road, East Syracuse, New York, 13057, up to the aggregate amount of seventy-one thousand six hundred seventy and no/100 U.S. dollars (\$71,670.00), available upon presentation of

- (1) your sight draft, bearing reference to this letter of credit No. 860401, and
- (2) Your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to regulations issued under authority of the New York State Environmental Conservation Law."

This letter of credit is effective as of 4/1/86 and shall expire on 4/1/87, but such expiration date shall be automatically extended for a period of one year on 4/1/87 and on each successive expiration date thereafter, unless, at least 120 days before the current expiration date, we notify both you and Roth Bros. Smelting Corp. by certified mail, return receipt requested, that we have decided not to extend this letter of credit beyond the current expiration date. In the event you are so notified, any unused portion of the credit shall be available upon presentation of your sight draft and the above-referred-to signed statement for 120 days after the date of receipt by both you and Roth Bros. Smelting Corp., as shown on the signed return receipts.

This is a notation credit. Each draft hereunder must be endorsed on the reverse of this letter of credit and each draft or attached writing must indicate that such notation has been made. This letter of credit must be attached to the last draft when the credit established by this letter of credit is exhausted.

The sum or sums of all drafts under this letter of credit must not exceed the aggregate amount of seventy-one thousand six hundred seventy and no/100 dollars (\$71,670.00). The purpose of this letter of credit is to ensure that funds will be available and drafts may be drawn hereunder for the account of the Commissioner of the New York State Department of Environmental Conservation, for the benefit of the Department of Environmental Conservation, for purposes pursuant to Article 27 of the New York State Environmental Conservation Law.



Letter of Credit No. 860401

Page -2-

The Merchants National Bank & Trust Company of Syracuse agrees that whenever this letter of credit is drawn on, under and in compliance with the terms of this letter of credit, that The Merchants National Bank & Trust Company of Syracuse shall duly honor such draft upon presentation to The Merchants National Bank & Trust Company of Syracuse and The Merchants National Bank & Trust Company of Syracuse shall pay the amount of the draft to the Commissioner of the New York State Department of Environmental Conservation or into standby trust in accordance with the Commissioner's instructions.

We certify that the wording of this letter of credit is identical to the wording specified in New York Codes, Rules and Regulations, Title 6, Part 370 et seq., as such regulations were constituted on the date shown immediately below.

Except as otherwise stated herein, this letter of credit is to be governed by the Uniform Customs and Practice for Documenting Credits (1983 Revision), published by the International Chamber of Commerce, Brochure No. 400.

Very truly yours,
THE MERCHANTS NATIONAL BANK & TRUST
COMPANY OF SYRACUSE

By: Patrick J. Chambers
Patrick J. Chambers, Vice President

Endorsements of Drafts Drawn:

Date	Negotiated By	AMOUNT	
		In Words	In Figures

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

This Letter of Credit shall be cancelled and attached to the last draft.

CO-OP CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY)
4/8/86

PRODUCER

Miller Agency of New York, Inc.
7000 E. Genesee Street
P. O. Box 129
Fayetteville, New York 13066

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

COMPANY LETTER	A	United States Fire Insurance Company
COMPANY LETTER	B	
COMPANY LETTER	C	
COMPANY LETTER	D	
COMPANY LETTER	E	

INSURED

Roth Brothers Smelting Corp.
6223 Thompson Road
P. O. Box 638
E. Syracuse, New York 13057

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES.

TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIABILITY LIMITS IN THOUSANDS		
					EACH OCCURRENCE	AGGREGATE
GENERAL LIABILITY				BODILY INJURY	\$	\$
COMPREHENSIVE FORM				PROPERTY DAMAGE	\$	\$
PREMISES OPERATIONS				BI & PD COMBINED	\$	\$
UNDERGROUND				PERSONAL INJURY		\$
EXPLOSION & COLLAPSE HAZARD						
PRODUCTS COMPLETED OPERATIONS						
CONTRACTUAL						
INDEPENDENT CONTRACTORS						
BROAD FORM PROPERTY DAMAGE						
PERSONAL INJURY						
AUTOMOBILE LIABILITY				BODILY INJURY PER PERSON	\$	
OWN AUTO				BODILY INJURY PER ACCIDENT	\$	
ALL OWNED AUTOS (PRIV. PASS)				PROPERTY DAMAGE	\$	
ALL OWNED AUTOS (OTHER THAN PRV. PASS)				BI & PD COMBINED	\$	
RENTAL AUTOS						
NON-OWNED AUTOS						
GARAGE LIABILITY						
EXCESS LIABILITY				BI & PD COMBINED	\$	\$
UMBRELLA FORM						
OTHER THAN UMBRELLA FORM						
WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY				STATUTORY		
				\$	(EACH ACCIDENT)	
				\$	(DISEASE-POLICY LIMIT)	
				\$	(DISEASE-EACH EMPLOYEE)	
OTHER						
Pollution Liability	5250009492	4/1/86	4/1/87		\$2,000,000 each pollution incident.	\$4,000,000 aggregate

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

* See endorsement attached.

CERTIFICATE HOLDER

New York State Dept. of Environmental Conservation
Att: Robert C. Kiddle
50 Wolf Road
Albany, New York 12233-0001

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY SHALL MAIL 60 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT. BY FAX OR TELEPHONE TO THE COMPANY'S NEW YORK OFFICE.

AUTHORIZED REPRESENTATIVE

FOIL 205613

HAZARDOUS WASTE FACILITY LIABILITY ENDORSEMENT

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering bodily injury and property damage in connection with the insurer's obligation to demonstrate financial responsibility under 6 NYCRR 370 et seq. The coverage applies at EPA ID# 006977086, Roth Bros. Smelting Corp., 6223 Thompson Road, P.O. Box 639, East Syracuse, N.Y. 13057 for sudden and non-sudden accidental occurrences. The limits of liability are \$2,000,000 each pollution incident; \$4,000,000 aggregate, exclusive of defense costs.

2. The insurance afforded with respect to such occurrences is subject to all the terms and conditions of the policy; provided, however, that any provision of the policy inconsistent with subsections (a) through (f) of this Paragraph 2 are hereby amended to conform with such subsections (a) through (f):

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.

(b) The insurer is liable for the payment of amounts within any deductible applicable to the policy, with the right of reimbursement from the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated by virtue of the insured satisfying the financial test for liability coverage as established by the New York State Department of Environmental Conservation (hereinafter "NYSDEC") or by the Commission of NYSDEC (hereinafter referred to as the "Commissioner"), and as specified in 6 NYCRR 370 et seq.

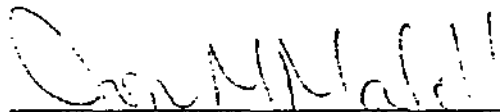
(c) Whenever requested by the Commissioner, the Insurer agrees to furnish to the Commissioner a signed duplicate original of the policy and all endorsements.

(d) Cancellation of this endorsement, whether by the Insurer or the Insured, will be effective only upon written notice, certified mail, return receipt requested, and only after the expiration of sixty (60) days after a copy of such written notice is received by the Commissioner.

(e) Any other termination of this endorsement will be effective only upon written notice, certified mail, return receipt requested, and only after the expiration of thirty (30) days after a copy of such written notice is received by the Commissioner.

(f) This endorsement shall be attached to and form a part of Policy No. 5250009492 issued by United States Fire Insurance Company, herein called the Insurer, of P O Box 4865, Syracuse, New York to Roth Bros. Smelting Corp. of P O Box 639, East Syracuse, New York 13057 this 8th day of April 1986. The effective date of the policy is the 1st day of April, 1986.

I hereby certify that the wording of this endorsement is identical to the wording specified in 6 NYCRR 370 et seq., as such regulation was constituted on the date first above written, and that the Insurer is authorized by the Superintendent of the New York State Department of Insurance to conduct the business of insurance within the State of New York or is eligible to provide insurance, where applicable, as an excess or surplus lines insurer within the State of New York.



(Signature of Authorized Rep. of Insurer)
Jon M. Maloff
Producer, Authorized Representative of:
United States Fire Insurance Company
P.O. Box 4865
Syracuse, New York

DATE: 04/08/86

Policy issued to Roth Bros. Smelting Corp.; Endorsement takes effect on April 1, 1986; Policy No. 5250009492; Endorsement number: 1-



(Signature of Authorized Rep. of Insurer)
Jon M. Maloff
Producer, Authorized Representative of:
United States Fire Insurance Company
P O Box 4865
Syracuse, New York

DATE: 04/08/86

Appendix B

Appendix B

APPENDIX B
Hazardous Waste Manifests





HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Loth Brothers Smelting Corp. 123 Thompson Road, E. Syracuse, NY 13057		4. Generator's Phone (Area Code) 315-456-7890		A. State Manifest Document Number CWMA 479316		
5. Transporter 1 Company Name		6. US EPA ID Number		C. State Transporter's ID N12036 MA		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (800) 233-2124		
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number		E. State Transporter's ID F. Transporter's Phone G. State Facility's ID H. Facility's Phone 205/652-9721		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. Hazardous Substance, Solid, n.t.c., (Polychlorinated Biphenyls) CWM Profile Number 091403-0020 PCB, NA 9105		0128		19771		PCB
b. CWM Profile Number						
c. CWM Profile Number						
d. CWM Profile Number						
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above				
15. Special Handling Instructions and Additional Information a) RC1406 - TSCA Required Information Attached Work Order #: 920921-013 Purchase Order #: P3536 For Emergency Response: NEAL SCHWARTZ						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name NEAL SCHWARTZ		Signature		Month Day Year 11/1/91		
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Month Day Year
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Month Day Year
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Month Day Year		



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Beth Brothers Smelting Corp. 6233 Thompson Road, N. Syracuse, NY 13057		4. Generator's Phone (415) 483-4400	5. Transporter 1 Company Name Beth Brothers Smelting Corp.	6. US EPA ID Number 1307989999947	A. State Manifest Document Number CWMA 544055
7. Transporter 2 Company Name		8. US EPA ID Number	9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459	10. US EPA ID Number ALD000622464	B. State Generator's ID Same C. State Transporter's ID PC8758PV D. Transporter's Phone (800) 233-2126 E. State Transporter's ID F. Transporter's Phone G. State Facility's ID H. Facility's Phone 205/652-9721
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) a. RC Hazardous Substance, Solid, n.o.s., (Polychlorinated Biphenyls) 091453-0020 PCB, NA 9136 CWM Profile Number BC 1406		12. Containers No. Type 0312 1 19525	13. Total Quantity 19525	14. Unit Kg	Waste No. PCB
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above a. L b. d			
Special Handling Instructions and Additional Information a) BC1406 - TSCA Required Information Attached For Emergency Response: Work Order #: 920923-027 Purchase Order #: 73536 NEAL SCHWARTZ					
GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name NEAL SCHWARTZ		Signature		Month Day Year 09/21/92	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year 09/21/92	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
19. Discrepancy Indication Space					
O. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name		Signature		Month Day Year	



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address		6. US EPA ID Number		A. State Manifest Document Number	
Roth Brothers Smelting Corp. 6243 Thompson Road, E. Syracuse, NY 13055		001493-0020		CWMA 505567	
4. Generator's Phone () 315 468-0500		7. US EPA ID Number		B. State Generator's ID	
5. Transporter 1 Company Name		8. US EPA ID Number		C. State Transporter's ID	
CWM-4, SA 9108		001493-0020		M 70047-114	
7. Transporter 2 Company Name		9. US EPA ID Number		D. Transporter's Phone (Area) 233-2126	
9. Designated Facility Name and Site Address		10. US EPA ID Number		E. State Transporter's ID	
CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		ALD000622464		F. Transporter's Phone	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol
a. Hazardous Substance, Solid, P.O.S.: 001493-0020 (Polychlorinated Biphenyls) CWM Profile Number BC 1406		No. Type			
b. CWM Profile Number		030 C B 140620			
c. CWM Profile Number					
d. CWM Profile Number					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information					
a) 201406 - TSCA Acquired Information Attached		For Emergency Response: NEAL SCHWARTZ			
Work Order #: 920930-013		Purchase Order #:			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name		Signature		Month Day Year	
JOHN MENDEL		[Signature]		10-17-91	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. AL1712010149171018151712028		Manifest Document No. 71-12028		2. Page 1 of		Information in the shaded areas is not required by Federal law.													
3. Generator's Name and Mailing Address Such Brothers Smelting Corp. 6123 Thompson Road, E. Syracuse, NY 13657						A. State Manifest Document Number CWMA 544054															
4. Generator's Phone (315) 462-9500						B. State Generator's ID Same															
5. Transporter 1 Company Name Gary Goodale Transport			6. US EPA ID Number NY1201916191619147			C. State Transporter's ID N12036 Main															
7. Transporter 2 Company Name			8. US EPA ID Number			D. Transporter's Phone (800) 233-2126															
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459			10. US EPA ID Number AL1000622464			E. State Transporter's ID															
						F. Transporter's Phone															
						G. State Facility's ID															
						H. Facility's Phone 205/652-9721															
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) BRQ Hazardous Substance, Solid, n.d.s., (Polychlorinated Biphenyls) 091493-0020 PCB-E, NA 9185 CWM Profile Number 30 1406						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		Waste No.									
						1		19		1		PCB									
b. CWM Profile Number																					
c. CWM Profile Number																					
d. CWM Profile Number																					
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above a. L b. c. d.															
15. Special Handling Instructions and Additional Information a) 101406 - TSCA Required Information Attached Work Order #: 920930-022 Purchase Order #: For Emergency Response: NEAL SCHWARTZ																					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																					
Printed/Typed Name JOHN MENCHELLA						Signature [Signature]						Month Day Year 10/2/89									
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name [Name]						Signature [Signature]						Month Day Year 10/2/89									
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name						Signature						Month Day Year									
19. Discrepancy Indication Space																					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name [Name]														Signature [Signature]						Month Day Year 10/2/89	



Form Approved, OMB No. 2050-0039. Expires 9-30-91

CDA Form 9700-22 (Rev. 0-88) Previous edition is obsolete.

GENERATOR NO. 1

FOIL2056221



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Roth Brothers Smelting Corp. 6223 Thompson Road, E. Syracuse, NY 13057		5. 10 10 16 19 17 10 16 16		A. State Manifest Document Number CWMA 639640	
4. Generator's Phone (315) 463-9500		6. US EPA ID Number		B. State Generator's ID Same	
5. Transporter 1 Company Name Gary Goodelle Transport		7. 10 10 16 19 16 19 16 17		C. State Transporter's ID 210316 M-11	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (800) 233-2126	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number A L D 0 0 0 6 2 2 4 6 4		E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone 205/652-9721	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. 20 Hazardous Substance, Solid, n.o.s., (Polychlorinated Biphenyls) ORN-E, NA 9188		No.	Type		
CWM Profile Number SC 1406		22	15	17	PCB
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
		a. L. c.			
		b. d.			
15. Special Handling Instructions and Additional Information					
a) SC1406 - TSCA Required Information Attached For Emergency Response: NEAL Schwartz					
Work Order #: 920930-022 Purchase Order #: P3536					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.					
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name John MENCHETTA		Signature <i>[Signature]</i>		Month Day Year 11/14/91	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name		Signature		Month Day Year	

FOIL205623



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N Y B K O 6 9 1 7 1 0 8 6 3 1 2 3 7		Manifest Document No. 3 1 2 3 7		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Roth Brothers Smelting Corp. 6223 Thompson Road, E. Syracuse, NY 13057						A. State Manifest Document Number CWMA 639642							
4. Generator's Phone (315) 463-9500						B. State Generator's ID Same							
5. Transporter 1 Company Name Gary Goodelle Transport			6. US EPA ID Number N Y B K O 6 9 1 7 1 0 8 6 3 1 2 3 7			C. State Transporter's ID N Y B K O 6 9 1 7 1 0 8 6 3 1 2 3 7							
7. Transporter 2 Company Name			8. US EPA ID Number			D. Transporter's Phone (800) 233-2126							
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459			10. US EPA ID Number A L D 0 0 0 6 2 2 4 6 4			E. State Transporter's ID							
						F. Transporter's Phone							
						G. State Facility's ID							
						H. Facility's Phone 205/652-9721							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) RQ Hazardous Substance, Solid, n.o.s. (Polychlorinated Biphenyls) ORM-E, NA 9188 CWM Profile Number BC 1406						12. Containers No. Type 120 G F 176 B 7		13. Total Quantity		14. Unit Wt/Vol		15. Waste No. PCB	
b. CWM Profile Number													
c. CWM Profile Number													
d. CWM Profile Number													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above a. I c. b. d.							
15. Special Handling Instructions and Additional Information a) BC1406 - TSCA Required Information Attached For Emergency Response: Work Order #: 92101-024 Purchase Order #93536 NEAL SCHWARTZ													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name: [Signature] Signature: [Signature] Month Day Year: 12 1 12													
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: [Signature] Signature: [Signature] Month Day Year: 12 1 12													
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: [Signature] Signature: [Signature] Month Day Year: 12 1 12													
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name: [Signature] Signature: [Signature] Month Day Year: 12 1 12													



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Rock Brothers Smelting Corp. 6223 Thompson Road, E. Syracuse, NY 13057		4. Generator's Phone (315) 463-9500		A. State Manifest Document Number CWMA 639644	
5. Transporter 1 Company Name Gary Goodelle Transport		6. US EPA ID Number NY 101916181617		B. State Generator's ID Same	
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Transporter's ID 28763E NY	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number AL D 000622464		D. Transporter's Phone (800) 233-2126	
				E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone 205/652-9721	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. RG Hazardous Substance, Solid, n.o.s., (Polychlorinated Biphenyls) GBH-E, RA 9186 CWM Profile Number BC 1406		12. Containers No. Type 030 CF 11/17/83		13. Total Quantity K	14. Unit Wt/Vol PCB
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above a. L c. L b. L d. L			
15. Special Handling Instructions and Additional Information a) BC1406 - TSCA Required Information Attached For Emergency Response: Work Order #: 72101-024 Purchase Order #: 72101-024					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name AL 11		Signature		Month Day Year	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name		Signature		Month Day Year	



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Roth Brothers Smelting Corp. 6223 Thompson Road, E. Syracuse, NY 13057						A. State Manifest Document Number CWMA 639643							
4. Generator's Phone (315) 463-9500						B. State Generator's ID Same							
5. Transporter 1 Company Name Gary Goodelle Transport						C. State Transporter's ID STATE 958412							
6. US EPA ID Number NY 019 016 916 916 147						D. Transporter's Phone (800) 233-2126							
7. Transporter 2 Company Name						E. State Transporter's ID							
8. US EPA ID Number						F. Transporter's Phone							
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35458						G. State Facility's ID							
10. US EPA ID Number AL 000 062 246 4						H. Facility's Phone 205/652-9721							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. PCB Hazardous Substance, Solid, n.o.s., (Polychlorinated Biphenyls) ORY-E, NA 9188						No. 123 Type CIF		2101016		F		PCB	
b. CWM Profile Number													
c. CWM Profile Number													
d. CWM Profile Number													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
						a. L. c. b. d.							
15. Special Handling Instructions and Additional Information													
a) RC1406 - TSCA Required Information Attached For Emergency Response: NEIL SCHWARTZ													
Work Order #: 14001-014 Purchase Order #: 14001													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name Neil Schwartz						Signature Neil Schwartz				Month Day Year 11 11 91			
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name Neil Schwartz						Signature Neil Schwartz				Month Day Year 11 11 91			
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name						Signature				Month Day Year			

FOIL205626



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Booth Brothers Smelting Corp. 6223 Thompson Road, E. Syracuse, NY 13057		4. Generator's Phone (315) 463-9500		A. State Manifest Document Number CWMA 587241	
5. Transporter 1 Company Name GARY GONDELLA TRANSPORT		6. US EPA ID Number 817000597706671217		B. State Generator's ID 3400	
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Transporter's ID T62757M	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number A140000622464		D. Transporter's Phone (800) 233-2126	
				E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone 205/652-9721	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. RC Hazardous Substance, Solid, n.o.s., (Polychlorinated Biphenyls) ORM-L, RA 9186 CWM Profile Number BC 1406		12. Containers No. Type 314-01F 1717019		13. Total Quantity K	14. Unit Wt/Vol K
b. CWM Profile Number					Waste No. PCB
c. CWM Profile Number					
d. CWM Profile Number					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above a. L. c. b. d.			
15. Special Handling Instructions and Additional Information a) BC1406 - TSCA Required Information Attached For Emergency Response: Work Order #: 921001-324 Purchase Order #: P2536 NEAL J. LUDWIG					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name: NEAL J. LUDWIG Signature: _____ Month Day Year: 10 9 1997					
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: _____ Signature: _____ Month Day Year: 10 9 1997					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: _____ Signature: _____ Month Day Year: _____					
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name: _____ Signature: _____ Month Day Year: _____					

FOIL205627

GENERATOR NO. 1



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 1 5 9 0 0 6 9 7 7 0 5 6	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Koth Brothers Smelting Corp. 6225 Thompson Road, E. Syracuse, NY 13057		6. US EPA ID Number		A. State Manifest Document Number CWMA 587242	
4. Generator's Phone (315) 463-9500		7. US EPA ID Number		B. State Generator's ID State	
5. Transporter 1 Company Name Gary Goodelle Transport		8. US EPA ID Number		C. State Transporter's ID	
7. Transporter 2 Company Name		9. US EPA ID Number		D. Transporter's Phone (800) 233-2126	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number		E. State Transporter's ID	
		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. PCB Hazardous Substance, Solid, n.o.s., (Polychlorinated Biphenyls) ORM-E, EA 9125 CWM Profile Number EC 1406		F. Transporter's Phone	
		12. Containers No. Type		G. State Facility's ID	
		13. Total Quantity		H. Facility's Phone 205/652-9721	
		14. Unit Wt/Vol		Waste No.	
b. CWM Profile Number				PCB	
c. CWM Profile Number					
d. CWM Profile Number					
J. Additional Descriptions for Materials Listed Above STATE OF ORIGIN - NEW YORK DISPOSAL APPROVAL NUMBER - CEM091493-0020		K. Handling Codes for Wastes Listed Above a. c. b. d.			
15. Special Handling Instructions and Additional Information a) 501406 - TSCA Required Information Attached For Emergency Response: Work Order #: 921006-034 Purchase Order #: 1110102912					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name Signature Month Day Year 11/10/02 912					
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year 11/10/02 912					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year					
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Year FOIL205628					

GENERATOR

TRANSPORTER

FACILITY



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NY 016106977026	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address Kath Brothers Smelting Corp. 6223 Thompson Road, E. Syracuse, NY 13057				A. State Manifest Document Number CWMA 587243			
4. Generator's Phone (315) 460-9500				B. State Generator's ID Same			
5. Transporter 1 Company Name Carr (Caddell) Transport		6. US EPA ID Number 016106977026		C. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (800) 233-2126			
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number AL 0100622464		E. State Transporter's ID			
				F. Transporter's Phone			
				G. State Facility's ID			
				H. Facility's Phone 205/652-9721			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Hazardous Substance, Solid, n.o.s., (Polychlorinated Biphenyls) ORM-E, AA 9188 CWM Profile Number HC 1406				12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No. PCB
b. CWM Profile Number							
c. CWM Profile Number							
d. CWM Profile Number							
J. Additional Descriptions for Materials Listed Above STATE OF ORIGIN - NEW YORK DISPOSAL APPROVAL NUMBER - CWM091493-0020				K. Handling Codes for Wastes Listed Above a. L c b. d			
16. Special Handling Instructions and Additional Information a) RC1406 - TSCA Required Information Attached For Emergency Response: Work Order #: 921006-034 Purchase Order #: 110102492							
17. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name Signature Month Day Year 11/10/12 11/10/12 11/10/12							
18. TRANSPORTER 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year 11/10/12 11/10/12 11/10/12							
19. TRANSPORTER 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year							
19. Discrepancy Indication Space							
20. FACILITY OWNER or OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Year FOIL205629							



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Both Brothers Smelting Corp. 6223 Thompson Road, E. Syracuse, NY 13657		4. Generator's Phone (315) 463-9500		A. State Manifest Document Number CWMA 587244	
5. Transporter 1 Company Name Gar, Goodell Transport		6. US EPA ID Number (315) 463-9500		B. State Generator's ID SAGE	
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Transporter's ID 117-7741	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number A L D 0 0 0 6 2 2 4 6 4		D. Transporter's Phone (800) 233-2126	
				E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone 205/652-9721	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol
a. PCB Hazardous Substance, Solid, N.O.S., (Polychlorinated Biphenyls) ORM-E, NA 9188 CWM Profile Number NC 1496		No. Type			
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					
J. Additional Descriptions for Materials Listed Above State of Origin: New York Disposal Approval No. CWM091493-0020		K. Handling Codes for Wastes Listed Above a. 2 b. d.			
15. Special Handling Instructions and Additional Information a. 8Ci406 - TSCA Required Information Attached For Emergency Response: Work Order #: Purchase Order #:					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name Signature Month Day Year 11/01/92					
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year 11/01/92					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year					
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Signature Month Day Year FOIL 205630					

GENERATOR

TRANSPORTER

FACILITY



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 3150917766	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address Koth Brothers Smelting Corp. 6223 Thompson Road, E. Syracuse, NY 13057				A. State Manifest Document Number CWMA 587240			
4. Generator's Phone (315) 463-9500				B. State Generator's ID Same			
5. Transporter 1 Company Name Gary Goodelle Transport		6. US EPA ID Number 3150917766		C. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (800) 233-2125			
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number A L D 0 0 0 6 2 2 4 6 4		E. State Transporter's ID			
				F. Transporter's Phone			
				G. State Facility's ID			
				H. Facility's Phone 205/652-9721			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. 200 Hazardous Substance, Solid, n.e.s., (Polychlorinated Biphenyls) CRM-E, RA 9183 CWM Profile Number 5C 1406				12. Containers No. Type 036 CB	13. Total Quantity	14. Unit Wt/Vol	Waste No. PCB
b. CWM Profile Number							
c. CWM Profile Number							
d. CWM Profile Number							
J. Additional Descriptions for Materials Listed Above State of Origin: New York Disposal Approval No. CWM091493-0020				K. Handling Codes for Wastes Listed Above a. L c. b. d.			
15. Special Handling Instructions and Additional Information a) BC1406 - TSCA Required Information Attached For Emergency Response: Work Order #: Purchase Order #: 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name				Signature		Month Day Year 11/01/92	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Month Day Year 11/01/92	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Year FOI 205631							

DNR
MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

1969.
Failure to file is punishable under
section 299.548 MCL or Section 10 of
Act 136, P.A. 1969.

Please print or type.

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 70006977086		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Roth Brothers Smelting Corp. 6223 Thompson Road, E. Syracuse, NY 13057						A. State Manifest Document Number MI 2540551			
4. Generator's Phone (315) 463-9500						B. State Generator's ID Same			
5. Transporter 1 Company Name						C. State Transporter's ID			
6. US EPA ID Number						D. Transporter's Phone			
7. Transporter 2 Company Name						E. State Transporter's ID			
8. US EPA ID Number						F. Transporter's Phone			
9. Designated Facility Name and Site Address Michigan Disposal, Inc. 49350 North I-94 Service Drive Eastville, MI 48111						G. State Facility's ID			
10. US EPA ID Number						H. Facility's Phone (313) 697-7830			
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER) HM						12. Containers		13. Total Quantity	
						No. Type		Unit W/Vol	
								Waste No. N/H	
a. X RQ Hazardous Waste, Solid, n.o.s., (D006, D008)								D 0 0 6 R	
b. ORM-R, RA 9189									
c.									
d.									
14. Additional Descriptions for Materials Listed Above a) 268-A1(a)						K. Handling Codes for Wastes Listed Above a) 1 b) 1 c) 1 d) 1			
15. Special Handling Instructions and Additional Information a) 07109028 also D003, D01D, D03D - FRG 431 - LDR Attached						Emergency Contact: UTSA			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.									
I am a large quantity generator. I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name						Signature		Date Month Day Year 11/02/92	
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature		Date Month Day Year 11/02/92	
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature		Date Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name						Signature		Date Month Day Year	

DNR
MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under community
1979, as amended and Act 136, P.A.
1969.
Failure to file is punishable under
section 299.548 MCL or Section 10 of
Act 136, P.A. 1969.

Please print or type.

Form Approved. OMB No. 2050-0039 Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NYD006977086		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.							
3. Generator's Name and Mailing Address Roth Brothers Smelting Corp. 6223 Thompson Road, E. Syracuse, NY 13057						A. State Manifest Document Number MI 2732843									
4. Generator's Phone (315) 463-9500						B. State Generator's ID Same									
5. Transporter 1 Company Name General Waste						C. State Transporter's ID 7220725									
6. US EPA ID Number NYD006977086						D. Transporter's Phone									
7. Transporter 2 Company Name General Waste						E. State Transporter's ID									
8. US EPA ID Number						F. Transporter's Phone									
9. Designated Facility Name and Site Address Michigan Disposal, Inc. 49350 North I-94 Service Drive Bellefonte, MI 48811						G. State Facility's ID									
10. US EPA ID Number MI D000724831						H. Facility's Phone (313) 697-7830									
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER) RM Hazardous Waste, Solid, n.o.s., (D008, D006) ORM-E, NA 9189						12. Containers No. Type		13. Total Quantity		14. Unit M/Vol		1. Waste No. N/H			
						1		42.76		P		D008 H			
15. Additional Descriptions for Materials Listed Above 11a) 260.41(a)						K. Handling Codes for Wastes Listed Above a/ 1 b/ 1 c/ 1 d/ 1									
16. Special Handling Instructions and Additional Information 11a) Also D006 - D01D, 003D Waste Baghouse Dust - 071090MB WTSB 8/1/92															
18. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.															
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.															
Printed/Typed Name John M. ...						Signature <i>[Signature]</i>						Date Month Day Year 10/2/92			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name John M. ...						Signature <i>[Signature]</i>		Date Month Day Year 10/2/92	
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name						Signature		Date Month Day Year	
19. Discrepancy Indication Space															
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19															
Printed/Typed Name						Signature						Date Month Day Year			



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. [5] [1] [0] [0] [6] [9] [7] [7] [0] [6]		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address Rock Brothers Smelting Corp. 6213 Thompson Road, E. Syracuse, NY 13057						A. State Manifest Document Number CWMA 587246					
4. Generator's Phone (515) 465-9500						B. State Generator's ID Same					
5. Transporter 1 Company Name Core Goodwill Transport			6. US EPA ID Number [1] [1] [5] [5] [8] [6] [9] [6] [9] [4] [7]			C. State Transporter's ID		D. Transporter's Phone (800) 233-2110			
7. Transporter 2 Company Name			8. US EPA ID Number			E. State Transporter's ID		F. Transporter's Phone			
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459						10. US EPA ID Number [A] [L] [0] [0] [0] [6] [2] [2] [4] [6] [4]			G. State Facility's ID	H. Facility's Phone 205/652-9721	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		Waste No.	
a. Hazardous Substance, Solid, r.s.s. (Polychlorinated Biphenyls) ORM-E, NA 9180 CWM Profile Number BC 1406				7. 1. 9 F				K		PCB	
b. CWM Profile Number											
c. CWM Profile Number											
d. CWM Profile Number											
J. Additional Descriptions for Materials Listed Above State of Origin: New York Disposal Approval No. CWM091493-0020						K. Handling Codes for Wastes Listed Above a. L c. b. d.					
15. Special Handling Instructions and Additional Information a) 401406 - TSCA Required Information Attached For Emergency Response: Work Order #: Purchase Order #:											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name Signature Month Day Year 11/01/93/92											
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year 11/01/93/92											
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year											
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Year FOIL205634											

GENERATOR

TRANSPORTER

FACILITY



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Kath Brothers Smelting Corp. 6123 Thompson Road, E. Syracuse, NY 13057		4. Generator's Phone (315) 463-4500		A. State Manifest Document Number CWMA 587245	
5. Transporter 1 Company Name Saf. Goodella Transport		6. US EPA ID Number 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		B. State Generator's ID Same	
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Transporter's ID	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		D. Transporter's Phone (810) 233-2126	
				E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone 205/652-9721	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit	15. Waste No.
a. PCB Hazardous Substance, Solid, n.o.s., (Polychlorinated Biphenyls) ORG-E, NA 9188 CWM Profile Number EC 1406		No. Type			
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					
J. Additional Descriptions for Materials Listed Above State of Origin: New York Disposal Approval No. CW091493-0020		K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information a) EC1406 - TSCA Required Information Attached		For Emergency Response:			
Work Order #:		Purchase Order #:			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name		Signature		Month Day Year	
				11/01/93	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
				11/03/93	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	

FOIL 205635

2:00

Appendix C

APPENDIX C
Daily Field Reports



DAILY FIELD REPORT

PROJECT:	Closure Activities Roth Bros. Smelting Corp.	DATE:	5 Oct. 1992
		PAGE:	1 of 2
		FILE:	70185-45

CLIENT:	Roth Bros. Smelting Corp.
CONTRACTOR:	Action Cleaners
WEATHER:	Sunny, 60°

0700:	Margaret J. Corrigan (H&A of New York) on site.
0715:	Elizabeth D. Henderson (H&A of New York) on site.
0715-0730:	Discussed sampling information with EDH.
0730-0800:	Met with John Menchella (Roth Bros.) to discuss closure activities, and tour closure areas.
0800-0815:	Roth Bros. personnel provided and assembled scaffolding to be used in Plant 1 cleaning. Action Cleaners on site.
0815-1015:	MJC obtained preliminary wipe samples from Plant 1 and Plant 2 lead and copper storage areas (9 wipe samples taken).
1010-1020:	Obtained pre-cleaning photographs of Plant 1 room.
1015-1030:	Action Cleaners and MJC suited up in Level C protection to enter room at Plant 1. (5 persons).
1030-1200:	Action Cleaners sprayed cleaner over entire room. Used scaffolding to reach ceiling.
1215-1315:	Lunch break.
1315-1330:	Action Cleaners and MJC suited up in Level C protection to continue cleaning room at Plant 1 (5 persons).
1330-1700:	Action Cleaners sprayed down ceiling, walls, and floor with power sprayer. Ceiling was cleaned using scaffolding. Walls were power sprayed and scrubbed with brushes (from 8 ft. high to floor level). Floors were cleaned with power sprayer and brooms. All water was vacuumed up and disposed of into drums. Solids were shoveled into drums.

DAILY FIELD REPORT

PROJECT:	Closure Activities Roth Bros. Smelting Corp.	DATE:	5 Oct. 1992
		PAGE:	2 of 2
		FILE:	70185-45

CLIENT:	Roth Bros. Smelting Corp.
CONTRACTOR:	Action Cleaners
WEATHER:	Sunny, 60°

1700-1730:	Demobilization and equipment decontamination by Action cleaners.
1730:	Action Cleaners left site.
1730-1745:	Organizing and labeling sample jars to obtain confirmation wipe samples.
1745-1815:	Obtained confirmation wipe samples from Plant 1 (5 wall wipes, 1 floor wipe).
1800-1930:	Roth Bros. personnel assisted in attempt to obtain concrete core samples from Plant 1 room.
1930:	Unable to obtain samples with concrete coring machine.
1930:	MJC left site, delivered confirmation wipe samples to Upstate Laboratories in East Syracuse.

<u>FIELD REPRESENTATIVE</u>	<u>TIME ON SITE</u>	<u>OTHER</u>
Margaret Corrigan	0700-2000	1.5 hr. travel

DISTRIBUTION

Margaret J. Corrigan
H&A New York

DAILY FIELD REPORT

PROJECT:	Closure Activities Roth Bros. Smelting Corp.	DATE:	6 Oct. 1992
		PAGE:	1 of 2
		FILE:	70185-45
CLIENT:	Roth Bros. Smelting Corp.		
CONTRACTOR:	Action Cleaners		
WEATHER:	Sunny, 62°		

0700: MJC on site.

0710: Met with John Menchella (Roth Bros.). Discussed final preparations regarding removal of all material from Plant 2, lead and copper HWMU storage areas.

0730: Action Cleaners on site. Dan O'Neill (Action Cleaners) stated they would initiate in copper storage area A.

0730-0745: MJC took pre-cleaning photographs of copper storage areas A and B.

0745-1000: John Menchella (Roth Bros.) assisted in obtaining confirmation concrete core samples at Plant 1.

0745-0900: Action Cleaners prepared equipment used to clean Plant 2, copper storage areas A and B, and the lead storage area.

Action Cleaners and MJC suited up in Level C protection (5 persons) to clean Plant 2, copper storage area A and B.

0900-1030: Action Cleaners applied cleaner at copper storage area A along walls to the predetermined height (approximately 12 ft.) down to the floor and on the floor. Applied cleaner at copper storage area B on walls and floor, and at lead storage area along walls and floor.

1030-1245: Action Cleaners sprayed copper storage area A with power sprayer. Began spraying floors from outside to the inside. Problems occurred while cleaning floor. Toward the back of the building grooves in asphalt were discovered. Decided to clean from inside out so material and mud were not caught in the 2-3 in. grooves. Also Action Cleaners dug out small trench along North wall of copper storage area A and disposed of those solids in drums.

1230-1245: Action Cleaners used scrub brush to do final spot cleaning along walls. All water generated during cleaning was vacuumed into drums.

1250-1350: Lunch break.

DAILY FIELD REPORT

PROJECT: Closure Activities DATE: 6 Oct. 1992
Roth Bros. Smelting Corp. PAGE: 2 of 2
FILE: 70185-45

CLIENT: Roth Bros. Smelting Corp.
CONTRACTOR: Action Cleaners
WEATHER: Sunny, 62°

1330: MJC called Elizabeth Henderson (H&A of New York) to inform her of the work progress. She informed me that the air cartridge taken on 5 October 1992 from Plant 1 had come back clean. Therefore, we would no longer need to use respirators. Instead dust masks and safety glasses would be sufficient.

1330: MJC gave John Menchella air sampling cartridge taken for 4 hrs. at HWMU storage areas on Plant 2, for delivery to Upstate Labs.

1350-1430: Action Cleaners swept copper storage area B with brooms, then power sprayed walls and floors. Contained all water using vacuums.

1430-1700: Action Cleaners swept lead storage area C with brooms then power sprayed walls and floor. Brushed down lead storage area walls prior to power spraying. All water was vacuumed and contained in drums.

1700-1730: Action Cleaners used dry vacuums to power sweep copper storage areas A and B.

1730-1750: Site demobilization and equipment decontamination by Action Cleaners.

1800: Action Cleaners left site.

1800-2015: MJC obtained confirmation wipe samples from 2 HWMU storage areas on Plant 2,. John Menchella (Roth Bros.) oversaw confirmation concrete core sampling from these areas.

2015: MJC left site, delivered samples to Upstate Laboratories, East Syracuse.

FIELD REPRESENTATIVE
Margaret Corrigan

TIME ON SITE
0700-2045

OTHER

DISTRIBUTION

Margaret J. Corrigan
H&A New York
FOIL205641

DAILY FIELD REPORT

PROJECT:	Closure Activities Roth Bros. Smelting Corp.	DATE:	7 Oct. 1992
		PAGE:	1 of 1
		FILE:	70185-45
CLIENT:	Roth Bros. Smelting Corp.		
CONTRACTOR:	Action Cleaners		
WEATHER:	Sunny, 50°		

0730: MJC on site.

0730-0800: Preparation of paperwork.

0800: Met with Greg Boltus and Daniel O'Neill (Action Cleaners) to look over Plant 2 HWMU storage areas.

0810-0845: MJC taped off core sampling locations at Plant 2, Areas A, B and C.

0910: Vince B. Dick and Larry P. Smith (H&A of New York) on site to view closure areas.

0915-0945: VBD, LPS, MJC (H&A of New York) and John Menchella (Roth Bros.) toured Hazardous Waste Management Units at Plant 1 and Plant 2.

0945-1000: VBD, LPS, and MJC toured other areas of Plant 2 for upcoming RFI tasks.

1000: VBD and LPS (H&A of New York) left site.

1000-1020: MJC obtained photographs of HWMU at Plant 1, and taped off concrete core sample locations.

1030: MJC left site.

FIELD REPRESENTATIVE
Margaret J. Corrigan

TIME ON SITE
0730-1030

OTHER
1.5 hrs. travel

DISTRIBUTION

Margaret J. Corrigan
H&A New York

DAILY FIELD REPORT

PROJECT:	Closure Activities Roth Bros. Smelting Corp.	DATE:	15 Oct. 1992
		PAGE:	1 of 2
		FILE:	70185-45

CLIENT:	Roth Bros. Smelting Corp.
CONTRACTOR:	Action Cleaners
WEATHER:	Cloudy/rain, 50°

0730:	MJC (H&A of New York) on site.
0730-0745:	Met with John Menchella (Roth Bros.) to discuss closure activities.
0745-0815:	Action Cleaners on site and began to prepare equipment and suit up (saranex and half-mask respirators).
0815-0845:	Action Cleaners swept up lead storage Plant 2, with brooms and disposed of dirt and debris into a drum.
0845-0900:	Action Cleaners applied cleaner to floor and scrubbed with brooms.
0900-0945:	Action Cleaners power sprayed floor in lead storage area on Plant 2. All water was vacuumed up and disposed of into drums.
0945-1000:	Site demobilization and equipment decontamination by Action Cleaners.
1000:	Action Cleaners left site.
1000-1030:	Discussed sample locations with John Menchella (Roth Bros.) and Vince Dick (H&A of New York).
1030-1100:	Roth Bros. personnel set up core machine to obtain composite TCLP lead samples in lead storage area on Plant 2.
1100-1200:	Obtained core samples from predetermined locations.

DAILY FIELD REPORT

PROJECT:	Closure Activities Roth Bros. Smelting Corp.	DATE:	15 Oct. 1992
		PAGE:	2 of 2
		FILE:	70185-45
CLIENT:	Roth Bros. Smelting Corp.		
CONTRACTOR:	Action Cleaners		
WEATHER:	Cloudy/rain, 50°		

1200-1215: MJC taped off concrete core sample locations.

1230: MJC left site, delivered confirmation TCLP lead core samples to Upstate Laboratories

<u>FIELD REPRESENTATIVE</u>	<u>TIME ON SITE</u>	<u>OTHER</u>
Margaret J. Corrigan	0730-1230	3.75 hrs. travel

DISTRIBUTION

Margaret J. Corrigan
H&A New York

Appendix D

APPENDIX D

Laboratory Analytical Results



Upstate Laboratories inc.

Shipping: 6034 Corporate Drive • East Syracuse, New York 13057 • (315) 437-0255
Mailing: Box 289 • Syracuse, New York 13206
Southern Region (607) 724-0478
Western Region (716) 436-9070
Eastern Region (518) 459-3134

RECEIVED

OCT 16 1992

H&A OF NEW YORK

October 14, 1992

Mr. John Menchella
Roth Bros. Smelting Corp.
6223 Thompson Rd.
E. Syracuse, NY 13057

Re: Analysis Report #101492011 - Roth Brothers Closure Activities

Dear Mr. Menchella:

Please find enclosed the results for your samples which were received on October 5 and 6, 1992.

We have included the Chain of Custody Record as part of your report. You may need to reference this form for a more detailed explanation of your sample.

Should you have any questions, please feel free to give us a call.

Thank you for your patronage.

Sincerely,

UPSTATE LABORATORIES, INC.

Anthony J. Scala
SL

Anthony J. Scala
Director

AJS/lw

Enclosures: report, invoice

cc/encs: N. Scala, ULI
file
E. Henderson, H&A of New York (copy report)

Note: Faxed results were given to your office and E. Henderson, H&A of New York, on 10/7, 10/9 and 10/13/92. AJS

Disclaimer: The test results and procedures utilized, and laboratory interpretations of data obtained by ULI as contained in this report are believed by ULI to be accurate and reliable for sample(s) tested. In accepting this report, the customer agrees that the full extent of any and all liability for actual and consequential damages of ULI for the services performed shall be equal to the fee charged to the customer for the services as liquidated damages.

DATE: 10/14/92

Update Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: *ap*

QC: *DC*

Lab V.D.: 10170

Sampled by: Client

ID: 27992127 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-1 10/5/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	<0.0005mg/wipe	
Total Lead	<0.01mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/l	32

ID: 27992128 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-2 10/5/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	0.0036mg/wipe	
Total Lead	0.11mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/l	32

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Update Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: *ag*

QC: *DC*

Lab I.D.: 10170

Sampled by: Client

ID: 27992129 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-3 10/5/92 G

PARAMETERS

RESULTS

KEY

Total Cadmium
Total Lead
PCB

0.014mg/wipe
2.7mg/wipe

Aroclor 1221
Aroclor 1016
Aroclor 1232
Aroclor 1242
Aroclor 1248
Aroclor 1254
Aroclor 1260
Total PCB

0.6ug/l

1.8ug/l

2.4ug/l

34
32
34
34
34
32
34
32

ID: 27992130 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-4 10/5/92 G

PARAMETERS

RESULTS

KEY

Total Cadmium
Total Lead
PCB

0.0097mg/wipe
1.4mg/wipe

Aroclor 1221
Aroclor 1016
Aroclor 1232
Aroclor 1242
Aroclor 1248
Aroclor 1254
Aroclor 1260
Total PCB

0.6ug/l

1.2ug/l

1.8ug/l

34
32
34
34
34
32
34
32

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Update Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: As

QC: De

Lab I.D.: 10170

Sampled by: Client

ID: 27992131 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-5 10/5/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	<0.0005mg/wipe	
Total Lead	0.07mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/l	32

ID: 27992132 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-6 10/5/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	0.0080mg/wipe	
Total Lead	1.3mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016	0.3ug/l	32
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254	0.5ug/l	32
Aroclor 1260		34
Total PCB	0.8ug/l	32

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

State Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: *ap*

QC: *DC*

Lab I.D.: 10170

Sampled by: Client

D 7992133 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-7 10/5/92 G

PARAMETERS

RESULTS

KEY

Total Cadmium
Total Lead
PCB

0.053mg/wipe
6.1mg/wipe

Aroclor 1221
Aroclor 1016
Aroclor 1232
Aroclor 1242
Aroclor 1248
Aroclor 1254
Aroclor 1260
Total PCB

0.4ug/l

0.7ug/l

1.1ug/l

34
32
34
34
34
32
34
32

D 7992134 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-8 10/5/92 G

PARAMETERS

RESULTS

KEY

Total Cadmium
Total Lead
PCB

0.0085mg/wipe
2.4mg/wipe

Aroclor 1221
Aroclor 1016
Aroclor 1232
Aroclor 1242
Aroclor 1248
Aroclor 1254
Aroclor 1260
Total PCB

<0.1ug/l

34
34
34
34
34
34
34
32

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Spillate Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: *ag*

QC: *DC*

Lab U.D.: 10170

Sampled by: Client

ID: 27992135 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-9 10/5/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	0.0064mg/wipe	
Total Lead	1.3mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/l	32

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Update Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: *ap*

QC: *DC*

Lab I.D.: 10170

Sampled by: Client

ID: 27992183 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-101 10/5/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	<0.0005mg/wipe	
Total Lead	0.02mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/l	32

ID: 27992184 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-103 10/5/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	<0.0005mg/wipe	
Total Lead	0.01mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/l	32

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Update Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: ay

QC: DC

Lab I.D.: 10170

Sampled by: Client

ID: 27992185 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-104 10/5/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	<0.0005mg/wipe	
Total Lead	0.02mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/l	32

ID: 27992186 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-105 10/5/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	<0.0005mg/wipe	
Total Lead	0.02mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/l	32

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Opstate Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: *ap*

QC: *DC*

Lab I.D.: 10170

Sampled by: Client

ID: 27992187 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-106 10/5/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	<0.0005mg/wipe	
Total Lead	0.02mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/l	32

ID: 27992188 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-107 10/5/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	<0.0005mg/wipe	
Total Lead	0.02mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/l	32

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

pp State Laboratories, Inc.
Analysis Results
Report Number: 101492011
Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: ay
QC: DC
Lab I.D.: 10170
Sampled by: Client

D-27992189 Mat:Wipe ROTH BROTHERS CLOSURE ACTIVITIES TRIP WIPE 10/5/92

PARAMETERS		RESULTS	KEY
-----		-----	----
Total	Cadmium	<0.0005mg/wipe	
Total	Lead	0.01mg/wipe	
PCB			

	Aroclor 1221		34
	Aroclor 1016	0.2ug/l	32
	Aroclor 1232		34
	Aroclor 1242		34
	Aroclor 1248		34
	Aroclor 1254	0.5ug/l	32
	Aroclor 1260		34
	Total PCB	0.7ug/l	32

1) results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

pp: Late Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: *Aug*

QC: *DC*

Lab I.D.: 10170

Sampled by: Client

D: 28092001 Mat: Solid

ROTH BROTHERS CLOSURE ACTIVITIES C-101 10/6/92 C

PARAMETERS

RESULTS

KEY

TCLP Cadmium
TCLP Lead

0.022mg/l
<0.1mg/l

D: 28092002 Mat: Solid

ROTH BROTHERS CLOSURE ACTIVITIES C-102 10/6/92 C

PARAMETERS

RESULTS

KEY

TCLP Cadmium
TCLP Lead

0.020mg/l
0.3mg/l

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Update Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: *ay*

QC: *DC*

Lab I.D.: 10170

Sampled by: Client

ID: 28192014 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-108 10/6/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	0.0031mg/wipe	
Total Lead	0.26mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242	0.7ug/wipe	32
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260	0.3ug/wipe	32
Total PCB	1.0ug/wipe	32

ID: 28192015 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-109 10/6/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	0.0011mg/wipe	
Total Lead	0.36mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016	0.4ug/wipe	32
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254	0.1ug/wipe	32
Aroclor 1260		34
Total PCB	0.5ug/wipe	32

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Unstate Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: *ap*

QC: *DC*

Lab I.D.: 10170

Sampled by: Client

ID: 28192016 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-110 10/6/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	0.0009mg/wipe	
Total Lead	0.08mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016	2.0ug/wipe	32
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254	0.15ug/wipe	32
Aroclor 1260		34
Total PCB	2.2ug/wipe	32

ID: 28192017 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-111 10/6/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	0.0011mg/wipe	
Total Lead	0.04mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/wipe	32

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

pp State Laboratories, Inc. :

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: *ap*

QC: *DC*

Lab I.D.: 10170

Sampled by: Client

D-28192018 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES TRIP WIPE 10/6/92

PARAMETERS	RESULTS	KEY
Total Cadmium	0.0009mg/wipe	
Total Lead	<0.01mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/wipe	32

D-28192019 Mat:Solid

ROTH BROTHERS CLOSURE ACTIVITIES C-108 10/6/92 C

PARAMETERS	RESULTS	KEY
TCLP Cadmium	0.090mg/l	
TCLP Lead	3.1mg/l	

D-28192020 Mat:Solid

ROTH BROTHERS CLOSURE ACTIVITIES C-112 10/6/92 C

PARAMETERS	RESULTS	KEY
TCLP Cadmium	0.008mg/l	
TCLP Lead	0.7mg/l	

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Upstate Laboratories, Inc.
Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: ap

QC: DC
Lab I.D.: 10170

Sampled by: Client

ID: 28192021 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-112 10/6/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	0.0052mg/wipe	
Total Lead	0.64mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016	0.2ug/wipe	32
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254	0.3ug/wipe	32
Aroclor 1260		34
Total PCB	0.5ug/wipe	32

ID: 28192022 Mat: Solid

ROTH BROTHERS CLOSURE ACTIVITIES C-113 10/6/92 C

PARAMETERS	RESULTS	KEY
TCLP Cadmium	0.057mg/l	
TCLP Lead	2.4mg/l	

ID: 28192023 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-113 10/6/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	0.0059mg/wipe	
Total Lead	1.1mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/wipe	32

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Update Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: *ap*

QC: *DC*

Lab I.D.: 10170

Sampled by: Client

ID: 28192024 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-114 10/6/92 G

PARAMETERS

RESULTS

KEY

Total Cadmium

0.0011mg/wipe

Total Lead

0.06mg/wipe

PCB

Aroclor 1221

34

Aroclor 1016

34

Aroclor 1232

34

Aroclor 1242

34

Aroclor 1248

34

Aroclor 1254

34

Aroclor 1260

34

Total PCB

<0.1ug/wipe

32

ID: 28192025 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-115 10/6/92 G

PARAMETERS

RESULTS

KEY

Total Cadmium

<0.0005mg/wipe

Total Lead

0.10mg/wipe

PCB

Aroclor 1221

34

Aroclor 1016

34

Aroclor 1232

34

Aroclor 1242

34

Aroclor 1248

34

Aroclor 1254

34

Aroclor 1260

34

Total PCB

<0.1ug/wipe

32

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Update Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: ay

QC: DC

Lab I.D.: 10170

Sampled by: Client

ID: 28192026 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-116 10/6/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	0.0018mg/wipe	
Total Lead	0.09mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/wipe	32

ID: 28192027 Mat: Solid

ROTH BROTHERS CLOSURE ACTIVITIES C-117 10/6/92 C

PARAMETERS	RESULTS	KEY
TCLP Cadmium	<0.005mg/l	
TCLP Lead	0.5mg/l	

ID: 28192028 Mat: Solid

ROTH BROTHERS CLOSURE ACTIVITIES C-118 10/6/92 C

PARAMETERS	RESULTS	KEY
TCLP Cadmium	<0.005mg/l	
TCLP Lead	0.3mg/l	

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Update Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: ap

QC: DC

Lab I.D.: 10170

Sampled by: Client

ID 28192029 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-118 10/6/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	0.011mg/wipe	
Total Lead	1.4mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254	0.11ug/wipe	32
Aroclor 1260		34
Total PCB	0.11ug/wipe	32

ID 28192030 Mat:Solid

ROTH BROTHERS CLOSURE ACTIVITIES C-119 10/6/92 C

PARAMETERS	RESULTS	KEY
TCLP Cadmium	<0.005mg/l	
TCLP Lead	0.3mg/l	

ID 28192031 Mat:Solid

ROTH BROTHERS CLOSURE ACTIVITIES C-120 10/6/92 C

PARAMETERS	RESULTS	KEY
TCLP Cadmium	0.099mg/l	
TCLP Lead	13mg/l	

All results are on an as rec.d basis unless otherwise stated.

Re cleaned
+ the removed
new
results are
very close

DATE: 10/14/92

Apparate Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: *ap*

QC: *DC*

Lab I.D.: 10170

Sampled by: Client

ID: 28192032 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-120 10/6/92 G

PARAMETERS

RESULTS

KEY

Total Cadmium
Total Lead
PCB

0.0083mg/wipe
1.3mg/wipe

Aroclor 1221
Aroclor 1016
Aroclor 1232
Aroclor 1242
Aroclor 1248
Aroclor 1254
Aroclor 1260
Total PCB

34
34
34
34
34
34
34
32

<0.1ug/wipe

ID: 28192033 Mat:Solid

ROTH BROTHERS CLOSURE ACTIVITIES C-121 10/6/92 C

PARAMETERS

RESULTS

KEY

TCLP Cadmium
TCLP Lead

0.086mg/l
(4.4mg/l)

ID: 28192034 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-122 10/6/92 G

PARAMETERS

RESULTS

KEY

Total Cadmium
Total Lead
PCB

0.0024mg/wipe
0.24mg/wipe

Aroclor 1221
Aroclor 1016
Aroclor 1232
Aroclor 1242
Aroclor 1248
Aroclor 1254
Aroclor 1260
Total PCB

34
34
34
34
34
34
34
32

<0.1ug/wipe

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Upstate Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: ag

QC: DC

Lab I.D.: 10170

Sampled by: Client

ID: 28192035 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-123 10/6/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	0.0019mg/wipe	
Total Lead	0.16mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/wipe	32

ID: 28192036 Mat: Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-124 10/6/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium	0.0015mg/wipe	
Total Lead	0.06mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.1ug/wipe	32

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Appellate Laboratories, Inc.

Analysis Results

Report Number: 101492011

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: ALP

QC: DL

Lab I.D.: 10170

Sampled by: Client

ID: 28192037 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-125 10/6/92 G

PARAMETERS

RESULTS

KEY

Total Cadmium

0.0028mg/wipe

Total Lead

0.31mg/wipe

PCB

Aroclor 1221

34

Aroclor 1016

34

Aroclor 1232

34

Aroclor 1242

34

Aroclor 1248

34

Aroclor 1254

34

Aroclor 1260

34

Total PCB

<0.1ug/wipe

32

ID: 28192038 Mat:Wipe

ROTH BROTHERS CLOSURE ACTIVITIES C-126 10/6/92 G

PARAMETERS

RESULTS

KEY

Total Cadmium

0.014mg/wipe

Total Lead

1.3mg/wipe

PCB

Aroclor 1221

34

Aroclor 1016

34

Aroclor 1232

34

Aroclor 1242

34

Aroclor 1248

34

Aroclor 1254

34

Aroclor 1260

34

Total PCB

<0.1ug/wipe

32

All results are on an as rec.d basis unless otherwise stated.

KEY PAGE

- 1 MATRIX INTERFERENCE PRECLUDES LOWER DETECTION LIMITS
- 2 MATRIX INTERFERENCE
- 3 PRESENT IN BLANK
- 4 INSUFFICIENT SAMPLE
- 5 SAMPLE DILUTED
- 6 BLANK CORRECTED
- 7 HEAD SPACE PRESENT IN SAMPLE
- 8 BDL(BELOW DETECTION LIMITS)
- 9 MDL(METHOD DETECTION LIMITS)
- 10 ADL(AVERAGE DETECTION LIMITS)
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- 12 SAMPLE ANALYZED OVER HOLDING TIME
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- 14 MG/L / PPB
- 15 MG/L(MILLIGRAMS PER LITER), PPM(PARTS PER MILLION)
- 16 UG/L(MICROGRAMS PER LITER), PPB(PARTS PER BILLION)
- 17 PARAMETER NOT ANALYZED WITHIN 15 MINUTES OF SAMPLING
- 18 MATRIX INTERFERENCE PRECLUDES LOWER DETECTION LIMITS/TOTAL XYLENES
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- 30 METHOD PERFORMANCE STUDY HAS NOT BEEN COMPLETED/ND(NON-DETECTED)
- 31 FIELD MEASURED PARAMETER TAKEN BY CLIENT
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- 33 NON-POTABLE WATER SOURCE
- 34 INDIVIDUAL AROCLORS DO NOT CARRY A DETECTION LIMIT BUT ARE INCLUSIVE
TO THE TOTAL PCB CONTENT
- 35 TOTAL XYLENES INCLUDE O, M, AND P/NON-POTABLE WATER SOURCE/SAMPLE
DILUTED
- 36 MATRIX INTERFERENCE CAUSING SPIKES TO RESULT IN LESS THAN 50.0% RECOVERY
- 37 MG/L / LBS PER DAY
- 38 MG/LCL2 / LBS PER DAY
- 39 UG/L / LBS PER DAY



ROTH BROS. SMELTING CORP.
CHAIN OF CUSTODY RECORD

10/7 had
for

SAMPLE LOG No.		PROJECT NAME & DESCRIPTION								
		Roth Brothers Closure Activities								
SAMPLERS NAME:		MARGARET J. CORRIGAN				DATE SAMPLED:			10/5/92	
SAMPLE No.	DATE	TIME	SAMPLE LOCATION	GRAB	COMP.	SAMPLE TYPE	No. OF CONTAINERS	ANALYSIS REMARKS		
127	10-5-92		C-1	✓		wipe	(2)	Total Lead, PCB, cadmium		
128	10-5-92		C-2	✓		wipe	(2)	"		
129	10-5-92		C-3	✓		wipe	(2)	"		
130	10-5-92		C-4	✓		wipe	(2)	"		
131	10-5-92		C-5	✓		wipe	(2)	"		
132	10-5-92		C-6	✓		wipe	(2)	"		
133	10-5-92		C-7	✓		wipe	(2)	"		
134	10-5-92		C-8	✓		wipe	(2)	"		
135	10-5-92		C-9	✓		wipe	(2)	"		
TOTAL:										

RELINQUISHED BY: (SIGN)	DATE	TIME	RECEIVED BY: (SIGN)
1 Margaret J. Corrigan	10-5-92		2 Stuart Spevak
RELINQUISHED BY: (SIGN)	DATE	TIME	RECEIVED BY: (SIGN)
2 Stuart Spevak	10-5-92	16:25	3 B. Damiano

I HEREBY CERTIFY THAT I AM QUALIFIED TO OBTAIN SAMPLES AND THAT THIS SAMPLE WAS TAKEN ACCORDING TO THE SAMPLING REQUIREMENTS SET FORTH IN 40 CFR 261 (SW - 846) (SIGN):

10/7 had
for
27992127-130



ROTH BROS. SMELTING CORP.
CHAIN OF CUSTODY RECORD

27992183-190
10/7 hand
190-1066

SAMPLE LOG No. _____	PROJECT NAME & DESCRIPTION <u>Roth Brothers Closure Activities</u>
----------------------	---

SAMPLERS NAME: <u>Margaret J. Corrigan</u>	DATE SAMPLED: <u>10/5/92</u>
--	------------------------------

SAMPLE No.	DATE	TIME	SAMPLE LOCATION	GRAB	COMP.	SAMPLE TYPE	No. OF CONTAINERS	ANALYSIS REMARKS
183	10-5-92		C-101	✓		wipe	(2)	Total Pb Total Cd
184	10-5-92		C-103	✓		wipe	(2)	"
185	10-5-92		C-104	✓		wipe	(2)	"
186	10-5-92		C-105	✓		wipe	(2)	"
187	10-5-92		C-106	✓		wipe	(2)	"
188	10-5-92		C-107	✓		wipe	(2)	"
189			Trip Wipe C				(2)	"
190	10-5-92	4 hrs run	Plant 1	✓		cardex sample	(1)	NIOSH method 7082 for lead
TOTAL:								

wipe
48 hrs turnaround time

NIOSH method 7082 for lead

RELINQUISHED BY: (SIGN) 1 <u>Margaret J. Corrigan</u>	DATE 10-5-92	TIME 1935	RECEIVED BY (SIGN) 2 <u>[Signature]</u>
RELINQUISHED BY: (SIGN) 2 _____	DATE	TIME	RECEIVED BY (SIGN) 3 _____

I HEREBY CERTIFY THAT I AM QUALIFIED TO OBTAIN SAMPLES AND THAT THIS SAMPLE WAS TAKEN ACCORDING TO THE SAMPLING REQUIREMENTS SET FORTH IN 40 CFR 261 (SW - 846) (SIGN):

[Signature]

27992183-190



ROTH BROS. SMELTING CORP.
CHAIN OF CUSTODY RECORD

28092001-2

10/9 hand

SAMPLE LOG No.		PROJECT NAME & DESCRIPTION						
		Roth Brothers Closure Activities						
SAMPLERS NAME: Margaret Corrigan		DATE SAMPLED: 10/6/92						
SAMPLE No.	DATE	TIME	SAMPLE LOCATION	GRAB	COMP.	SAMPLE TYPE	No. OF CONTAINERS	ANALYSIS REMARKS
1	10-6-92		C-101		✓	core	①	TCLP Lead TCLP Cadmium
2	10-6-92		C-102		✓	core	①	TCLP Lead TCLP Cadmium
NOTE: 60 hour turnaround time Please.								
TOTAL:								

RELINQUISHED BY: (SIGN) 1 Margaret J. Corrigan	DATE 10-6-92	TIME	RECEIVED BY (SIGN) 2 Stuart Spauld
RELINQUISHED BY: (SIGN) 2 Stuart Spauld	DATE 10-6-92	TIME 10:20	RECEIVED BY (SIGN) 3 B. Darniano

I HEREBY CERTIFY THAT I AM QUALIFIED TO OBTAIN SAMPLES AND THAT THIS SAMPLE WAS TAKEN ACCORDING TO THE SAMPLING REQUIREMENTS SET FORTH IN 40 CFR 261 (SW - 846) (SIGN):

28092001-2
10/9 hand



ROTH BROS. SMELTING CORP.
CHAIN OF CUSTODY RECORD

wipes 10/9
solids 10/13 HDD

SAMPLE LOG No. _____	PROJECT NAME & DESCRIPTION <u>Roth Brothers Closure Activities</u>
----------------------	---

SAMPLERS NAME: <u>Margaret J. Corrigan</u>	DATE SAMPLED: <u>10/6/92</u>
--	------------------------------

SAMPLE No.	DATE	TIME	SAMPLE LOCATION	GRAB	COMP.	SAMPLE TYPE	No. OF CONTAINERS	REMARKS
14	10-6-92		C-108	✓		wipe	(2)	Total Pb Cd min
15	10-6-92		C-109	✓		wipe	(2)	
16	"		C-110	✓		wipe	(2)	
17	"		C-111	✓		wipe	(2)	
18	"		Trip Wipe			wipe	(2)	
19	"		C-108		✓	core concrete	(1)	TCLP Pb Cd min
20	"		C-112		✓	core	(1)	
21	"		C-112	✓		wipe	(2)	48 hrs Turn
22	"		C-113		✓	core	(1)	60 hrs Turn
23	"		C-113	✓		wipe	(2)	Pb Cd, Pb
24	"		C-114	✓		wipe	(2)	
25	"		C-115	✓		wipe	(2)	
26	"		C-116	✓		wipe	(2)	
TOTAL:							23	

RELINQUISHED BY: (SIGN) 1 <u>Margaret J. Corrigan</u>	DATE <u>10-6-92</u>	TIME	RECEIVED BY (SIGN) 2 <u>Thomas S. Brosnan</u>
RELINQUISHED BY: (SIGN) 2 <u>Thomas S. Brosnan</u>	DATE	TIME	RECEIVED BY (SIGN) 3 _____

I HEREBY CERTIFY THAT I AM QUALIFIED TO OBTAIN SAMPLES AND THAT THIS SAMPLE WAS TAKEN ACCORDING TO THE SAMPLING REQUIREMENTS SET FORTH IN 40 CFR 261 (SW - 846) (SIGN): _____

28192014-26



ROTH BROS. SMELTING CORP. 28192027-38
CHAIN OF CUSTODY RECORD

Wipes 10/9/92
Soils 10/13/92

Page 2 of 2

SAMPLE LOG No.		PROJECT NAME & DESCRIPTION						
		Roth Brothers Closure Activities						
SAMPLERS NAME:		Margaret Corrigan			DATE SAMPLED:			10/16/92
SAMPLE No.	DATE	TIME	SAMPLE LOCATION	GRAB	COMP.	SAMPLE TYPE	No. OF CONTAINERS	REMARKS
27	10-6-92		C-117		✓	core	(1)	(TCLP Cd, Pb) re
28	10-6-92		C-118		✓	core	(1)	↓
29	"		C-118	✓		wipe	(2)	(T-Cd, Pb) re
30	"		C-119		✓	core	(1)	(TCLP Cd, Pb) re
31	"		C-120		✓	core	(1)	↓
32	"		C-120	✓		wipe	(2)	(T-Cd, Pb) re
33	"		C-121		✓	core	(1)	(TCLP Cd, Pb) re
34	"		C-122	✓		wipe	(2)	(T-Cd, Pb) re
35	"		C-123	✓		wipe	(2)	↓
36	"		C-124	✓		wipe	(2)	
37	"		C-125	✓		wipe	(2)	
38	"		C-126	✓		wipe	(2)	↓
TOTAL:							19	

RELINQUISHED BY: (SIGN)	DATE	TIME	RECEIVED BY: (SIGN)
1 Margaret J. Corrigan	10-6-92		2 Denise S. Brosseau 8:30pm 10/6/92
RELINQUISHED BY: (SIGN)	DATE	TIME	RECEIVED BY: (SIGN)
2			3

I HEREBY CERTIFY THAT I AM QUALIFIED TO OBTAIN SAMPLES AND THAT THIS SAMPLE WAS TAKEN ACCORDING TO THE SAMPLING REQUIREMENTS SET FORTH IN 40 CFR 261 (SW - 846) (SIGN):

28192027-38

Upstate Laboratories inc.

Shipping: 6034 Corporate Drive • East Syracuse, New York 13057 • (315) 437-0255

Mailing: Box 289 • Syracuse, New York 13205

Southern Region (607) 724-0478

Western Region (716) 436-9070

Eastern Region (518) 459-3134

October 16, 1992

RECEIVED

OCT 19 1992

H&A OF NEW YORK

Mr. John Menchella
Roth Bros. Smelting Corp.
6223 Thompson Rd.
E. Syracuse, NY 13057

Re: Analysis Report #101692025 - Roth Brothers Closure Activities

Dear Mr. Menchella:

Please find enclosed the results for your air samples which were received on October 5 and 6, 1992.

We have included the Chain of Custody Record as part of your report. You may need to reference this form for a more detailed explanation of your sample.

Should you have any questions, please feel free to give us a call.

Thank you for your patronage.

Sincerely,

UPSTATE LABORATORIES, INC.

Timothy O'Rourke

Timothy M. O'Rourke
Industrial Hygienist

TMO/jd

Enclosures: report, invoice

cc/encs: N. Scala, ULI
file

✓ E. Henderson, H&A of New York (copy report)

Note: Faxed results were given to your office and E. Henderson, H&A of New York on 10/7/92. TMO

Disclaimer: The test results and procedures utilized, and laboratory interpretations of data obtained by ULI as contained in this report are believed by ULI to be accurate and reliable for sample(s) tested. In accepting this report, the customer agrees that the full extent of any and all liability for actual and consequential damages of ULI for the services performed shall be equal to the fee charged to the customer for the services as liquidated damages.

DATE: 10/16/92

Upstate Laboratories, Inc.

Analysis Results

Report Number: 101692025

Client I.D.: ROTH BROS. SMELTING CORP.

Sampled by: H&A OF NEW YORK

APPROVAL: TOP

QC: DC

Lab I.D.: 10170

ROTH BROTHERS

CLOSURE ACTIVITIES PLANT 1 10/5/92 4H G

ULI I.D.: 27992190

Matrix: Air

PARAMETERS

RESULTS

KEY

Lead

<7ug/m3

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/16/92

Upstate Laboratories, Inc.

Analysis Results

Report Number: 101692025

Client I.D.: ROTH BROS. SMELTING CORP.

Sampled by: H&A OF NEW YORK

APPROVAL: DR

QC: DC

Lab I.D.: 10170

ROTH BROTHERS

CLOSURE ACTIVITIES PLANT 2 AREA A 10/6/92 4H C

ULI I.D.: 28092068

Matrix: Air

PARAMETERS

RESULTS

KEY

Lead

30ug/m3

All results are on an as rec.d basis unless otherwise stated.

KEY PAGE

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- 2 MATRIX INTERFERENCE
- 3 PRESENT IN BLANK
- 4 INSUFFICIENT SAMPLE
- 5 SAMPLE DILUTED
- 6 BLANK CORRECTED
- 7 HEAD SPACE PRESENT IN SAMPLE
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DILUTED
- 36 MATRIX INTERFERENCE CAUSING SPIKES TO RESULT IN LESS THAN 50.0% RECOVERY
- 37 MG/L / LBS PER DAY
- 38 MG/LCL2 / LBS PER DAY
- 39 UG/L / LBS PER DAY
- 40 MG/L LAS / LBS/DAY



ROTH BROS. SMELTING CORP.
CHAIN OF CUSTODY RECORD

2 1992183-196
10/7 hand
190-1016 head

SAMPLE LOG No.	PROJECT NAME & DESCRIPTION Roth Brothers Closure Activities
----------------	--

SAMPLERS NAME: Margaret J. Corrigan DATE SAMPLED: 10/5/92

SAMPLE No.	DATE	TIME	SAMPLE LOCATION	GRAB	COMP.	SAMPLE TYPE	No. OF CONTAINERS	Analysis REMARKS
183	10-5-92		C-101	✓		wipe	(2)	Total Pb Total Cd
184	10-5-92		C-103	✓		wipe	(2)	"
185	10-5-92		C-104	✓		wipe	(2)	"
186	10-5-92		C-105	✓		wipe	(2)	"
187	10-5-92		C-106	✓		wipe	(2)	"
188	10-5-92		C-107	✓		wipe	(2)	"
189			Trip Wipe				(2)	"
			C					
190	10-5-92	4 hrs run	Plant 1	✓		cartridge sample	(1)	NIOSH method 7082 for lead

wipe
48 hrs turn time

lead

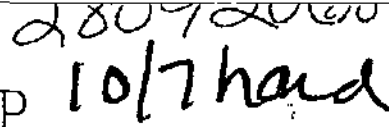
TOTAL:

RELINQUISHED BY: (SIGN) 1 Margaret J. Corrigan	DATE 10-5-92	TIME 1935	RECEIVED BY (SIGN) 2 [Signature]
RELINQUISHED BY: (SIGN) 2	DATE	TIME	RECEIVED BY (SIGN) 3

I HEREBY CERTIFY THAT I AM QUALIFIED TO OBTAIN SAMPLES AND THAT THIS SAMPLE WAS TAKEN ACCORDING TO THE SAMPLING REQUIREMENTS SET FORTH IN 40 CFR 261 (SW - 846) (SIGN):

~~74641232110816~~

2 1992183-196

[illegible]

FOIL205679

Upstate Laboratories inc.

Shipping: 6034 Corporate Drive • East Syracuse, New York 13057 • (315) 437-0255

Mailing: Box 289 • Syracuse, New York 13206

Southern Region (607) 724-0478

Western Region (716) 436-9070

Eastern Region (518) 459-3134

October 28, 1992

Mr. John Menchella
Roth Bros. Smelting Corp.
6223 Thompson Rd.
E. Syracuse, NY 13057

Re: Analysis Report #102892001 - Closure Activities-Roth Bros

Dear Mr. Menchella:

Please find enclosed the results for your samples which were received on October 15, 1992.

We have included the Chain of Custody Record as part of your report. You may need to reference this form for a more detailed explanation of your sample.

Should you have any questions, please feel free to give us a call.

Thank you for your patronage.

Sincerely,

UPSTATE LABORATORIES, INC.

Anthony J. Scala sh

Anthony J. Scala
Director

AJS/lw

Enclosures: report, invoice

cc/encs: N. Scala, ULI
file

✓ E. Henderson, H&A of New York (copy report)

Note: Faxed results were given to your office and E. Henderson, H&A of New York on 10/20/92. AJS

Disclaimer: The test results and procedures utilized, and laboratory interpretations of data obtained by ULI as contained in this report are believed by ULI to be accurate and reliable for sample(s) tested. In accepting this report, the customer agrees that the full extent of any and all liability for actual and consequential damages of ULI for the services performed shall be equal to the fee charged to the customer for the services as liquidated damages.

DATE: 10/28/92

Upstate Laboratories, Inc.

Analysis Results

Report Number: 102892001

Client I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: *ap*

QC: *DC*

Lab I.D.: 10170

Sampled by: H & A OF NEW YORK

ID:28992031 Mat:Solid CLOSURE ACTIVITIES-ROTH BROS C-127 10/15/92

PARAMETERS

RESULTS

KEY

TCLP Lead

18mg/l

ID:28992032 Mat:Solid CLOSURE ACTIVITIES-ROTH BROS C-128 10/15/92

PARAMETERS

RESULTS

KEY

TCLP Lead

23mg/l

ID:28992033 Mat:Solid CLOSURE ACTIVITIES-ROTH BROS C-129 10/15/92

PARAMETERS

RESULTS

KEY

TCLP Lead

3.6mg/l

ID:28992034 Mat:Solid CLOSURE ACTIVITIES-ROTH BROS C-130 10/15/92

PARAMETERS

RESULTS

KEY

TCLP Lead

42mg/l

ID:28992035 Mat:Solid CLOSURE ACTIVITIES-ROTH BROS C-131 10/15/92

PARAMETERS

RESULTS

KEY

TCLP Lead

4.0mg/l

All results are on an as rec.d basis unless otherwise stated.

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- 40 MG/L LAS / LBS/DAY

ROTH BROS. SMELTING CORP. 10/19/50 hard
CHAIN OF CUSTODY RECORD per

PROJECT NAME & DESCRIPTION

Closure Activities - Roth Bros

SAMPLERS NAME: Margaret Corrigan

DATE SAMPLED: 10/15/92

* Note:
60 hr maximum
Turnaround time

I HEREBY CERTIFY THAT I AM QUALIFIED TO OBTAIN SAMPLES AND THAT THIS SAMPLE WAS TAKEN ACCORDING TO THE SAMPLING REQUIREMENTS SET FORTH IN 40 CFR 261 (SW - 846) (SIGN):

Appendix E

APPENDIX E
Photographic Documentation





Photograph 1: View of Hazardous Waste Management Unit (HWMU) Plant 1 looking at east wall of room from NW doorway, prior to cleaning. Note black surface grime and dust along wall and floor prior to cleaning.



Photograph 2: View of HWMU Plant 1, after cleaning. Note the removal of black grime and dust from floor and east wall.



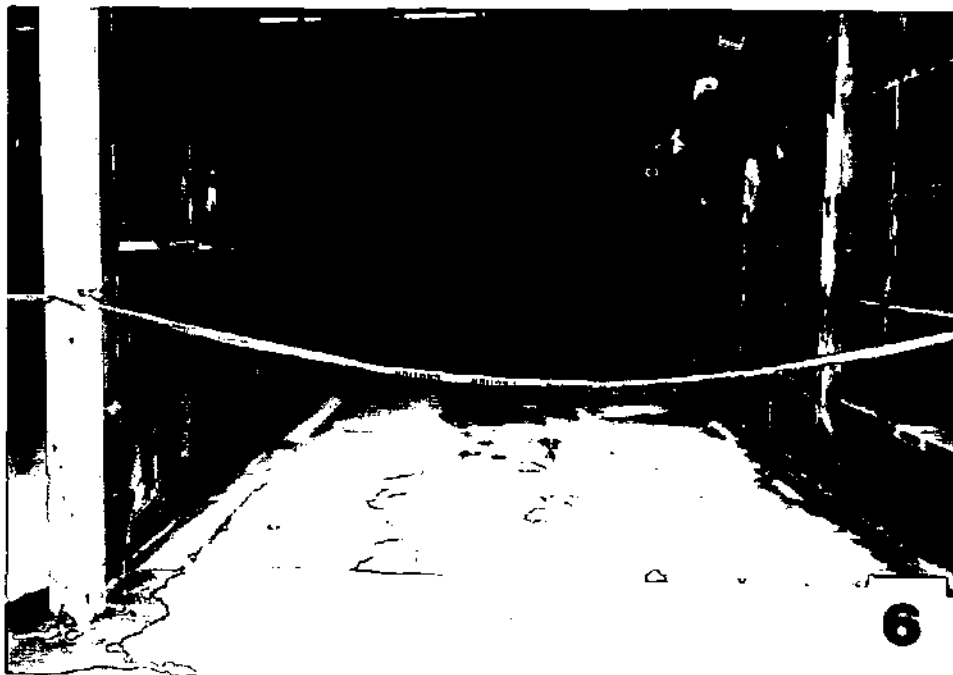
Photograph 3: View of HWMU Plant 2, Area A looking at south wall from the east side of the building, prior to cleaning. Note dust along floor and ledges of wall.



Photograph 4: View of HWMU Plant 2, Area A looking at SW corner of building from the east side of the building, after cleaning. Note removal of dust from floor, ledges and walls.



Photograph 5: View of HWMU Plant 2, Area A looking at north wall of building, prior to cleaning. Note accumulation of dust along ledge and floor.



Photograph 6: View of HWMU Plant 2, Area A looking at west wall of building, after cleaning. Note removal of dust from floor, walls and ledges.



Photograph 7: View of HWMU Plant 2, Area B looking at west wall of building, prior to cleaning. Note accumulation of dust on floor and walls.



Photograph 8: View of HWMU Plant 2, Area B looking at west wall of building, after cleaning. Note removal of dust from floor and walls.

FILE NO.

H & A OF NEW YORK
ROCHESTER, NEW YORK

FOIL205689



Photograph 9: View of HWMU Plant 2, Area C, looking at north wall, after cleaning.



Photograph 10: View of HWMU Plant 2, Area C looking at west wall, after cleaning.

FILE NO.

H & A OF NEW YORK
ROCHESTER, NEW YORK

FOIL205690

